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Strategic Planning  
Southend on Sea Borough Council  
Civic Centre  
Victoria Avenue  
Southend; SS2 6ER

Our Ref: LS/SBC/SAScoping2017

Date: 15 December 2017

Phone: [REDACTED]

Email: [REDACTED]

**BY EMAIL:** [REDACTED]

Dear [REDACTED]

**Integrated Impact Assessment (IIA) for the Southend on Sea Local Plan  
IIA SCOPING REPORT, October 2017**

Thank you for consulting Essex County Council (ECC) as an adjoining authority on the Sustainability Appraisal Scoping Report for the new Southend on Sea Local Plan. Officer comments are provided overleaf following the format of the report and relevant web-links are provided where appropriate.

ECC will continue to engage constructively, actively and on an on-going basis during the review and preparation of the new Local Plan. This is to ensure the continuation of a robust long-term strategy for Southend on Sea, which provides ECC with a reliable basis upon which to plan for our Services and consideration of strategic cross boundary matters for which we are responsible for.

Yours sincerely

[REDACTED]  
Principal Spatial Planner  
Planning Service

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# **SOUTHEND ON SEA LOCAL PLAN – INTEGRATED IMPACT ASSESSMENTS**

## **IIA SCOPING REPORT OCTOBER 2017**

### **ESSEX COUNTY COUNCIL OFFICER RESPONSE**

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#### **1. INTRODUCTION**

It is noted that the A Habitats Regulations Assessment for the Local Plan will be prepared as a separate document.

##### **1.1 Southend on Sea Borough's New Local Plan**

- The Scoping Report (Table 1) summarises that “With this in mind it would be useful for the Scoping Report to develop a framework for the assessment of such sites in a quantitative manner.

Overall the Scoping Report is thorough and ensures a comprehensive framework of sustainability / IIA Objectives and assessment questions. Despite this however and given the content of the Local Plan as outlined in Table 1, is to ‘*set out the Council’s strategic vision, policies and land allocations, where necessary, for meeting future needs (including housing, employment, community facilities, transport and other infrastructure needed to support development).*’ the Scoping Report does not include any framework for the quantitative assessment of options for site allocations within the emerging Local Plan.

It may be the case that a comparable level of information across all sites, in order to ensure a fair and consistent appraisal of all options, is not currently known at this stage; however it is recommended that such a framework is formulated and included in the IIA at relevant future consultation stages. This will enable input from the statutory consultees as to suitable assessment criteria.

- Timescales, it is noted that the timeframe is up to 2036, however is there a fixed base date?

#### **2. BIODIVERSITY**

##### **2.1 Context Review**

The following additional guidance documents should be included within the national and regional evidence base as follows:

###### **2.1.3 Local**

- Reference should be made to the **Adopted Essex and Southend on Sea Waste Local Plan 2017**, as part of the Local Context Review.  
This should be incorporated within the “Local” Context Review for each chapter, as it is part of the local areas planning policy framework.

##### **2.2 Baseline Review**

The following additional guidance documents should be included within the national and regional evidence base as follows:

###### **2.2.1.1. Internationally designated sites**

Reference should be made to the joint LPA approach to preparing a Recreational Avoidance and Mitigation Strategy (RAMS) for the Essex Coast to avoid likely impacts on the European sites can be updated now that this work has started and Southend on sea Council is a partner.

###### **2.2.1.3 Locally designated sites**

- This section includes reference to Local Nature Reserves (LNRs) which are **statutory** designated sites alongside SSSIs, and therefore have a different status to **non-**



**statutory**, locally designated sites. It is recommended that this information is provided in the Local Plan separately.

- As well as **Local Wildlife Sites (LoWS)**, **Local Geological Sites (LoGS)** are covered by the NPPF para 118, it is recommended that this dataset available from **GeoEssex** is added to the LPA baseline (see also NPPF para 117 below).
- The inclusion of **Priority habitats** and particularly the reference to **ancient woodland** is welcomed, although it is suggested this section may be better placed separately in the Local Plan.
- Reference should also be made to Non –replaceable habitats to support policies to minimise impacts on biodiversity
- The reference to providing **net gains for biodiversity** where possible is welcomed and this could be supported by promoting the use of DEFRA's biodiversity metric calculator to measure losses and gains

## 2.3 Key Issues

Although the issues for management are identified for international and nationally important sites, there is no reference to the equivalent for **local sites**. It is recommended that this is included, to report on positive conservation management under the Government's **Single Data List 160-00 Improved Local Biodiversity**.

## 2.4 IIA Objectives

### **Table 3 The IIA objective to Protect and enhance biodiversity**

The assessment questions regarding biodiversity within and surrounding the Borough concerning NPPF paragraph 117 are noted. However there is no reference to **NPPF paragraph 156**, this should be included as it also requires the Local Planning Authority to set out the **strategic priorities for conservation and enhancements for the natural environment**.

It is recommended that the assessment questions are amended as follows to also address NPPF paragraph 156:

- This seeks to minimise impacts to biodiversity by having planning policies which should:
- *plan for biodiversity at a landscape-scale across local authority boundaries;*
- *identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;*
- *promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan;*
- ***aim to prevent harm to geological conservation interests;***

## 3. CLIMATE CHANGE

### 3.1 Context Review

The following additional guidance documents should be included within the national and regional evidence base as follows:

#### **National:**

- The Environment Agency's climate change allowances as detailed in link below:  
<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>
- **Adapting to Climate Change: Advice for Flood and Coastal Erosion Risk Management Authorities (2015):** this document contains advice to ensure that an



economically credible appraisal, taking into account of the uncertainties associated with climate change, can be made to support investment decisions. Given the long lifetime and high cost of the built environment and many flood and coastal erosion management measures, it is imperative that plans and investment projects take into account, in an appropriate way, the changing risks over the coming century. This includes designing for adaptation to a changing climate where appropriate.

### 3.1.2 Regional:

- The South Essex Surface Water Management Plan should also be considered. [South Essex Surface Water Management Plan 2012](#)
- **The Essex SuDS Design Guide (2016)** – The Essex SuDS Design guide provides local standards for water quality and water quantity from developments and guidance on SuDS design. (weblink: [SuDS design guide PDF, 15MB](#))

Any surface water proposals should be in accordance with the Essex SuDS Design Guide, to address any cross boundary matters in the event that surface water is discharged to any watercourses which go through Essex or ultimately end up discharging into Essex.

## 4. LANDSCAPE AND HISTORIC ENVIRONMENT

### 4.1 Context Review

The following additional guidance documents should be included within the national and regional evidence base as follows:

#### 4.1.1 National

- **Green Infrastructure** is an integral part of both the built and natural environment. Reference has been made to the term in sections of the IIA, but not the landscape and historic environment section, where it is most important. For instance, the NPPF makes reference to the following statement in its Core Planning Principle: Conserving and enhancing the natural environment: ***“Paragraph 144: Set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.”***

ECC would anticipate Green Infrastructure and reference to NPPF paragraph 144 to be explicitly incorporated within this section and the Scoping Report.

#### 4.1.2 Local

- **Essex Design Guide**

It is noted that the Scoping Report does not include any reference to the Essex Design Guide (2005) or the upcoming 2018 revision which is due for launch in January 2018. Whilst SBC may not be party to the 2005 EDG, it is a party to the upcoming 2018 version and we would anticipate this guide being referenced within 4.1.2, in addition to the Southend on Sea Design and Townscape Guide (2009).

The EDG is considered an appropriate and important document which should be referenced and included within the Scoping Report. As indicated above and below, the EDG is currently being revised with new sections, including: Green infrastructure, Garden Communities and SuDS which could form key adoptable guidelines for future development.

- **Green Infrastructure**

The **Southend-one-Sea Core Strategy** (adopted 2007) **Policy CP4** has been referred to, but primarily from an urban environment stance. Therefore the following statements should also be incorporated: *“10. creating and maintaining a ‘Green Grid’ of high quality, linked and publicly accessible open spaces across the town which contribute to and help develop the Thames Gateway Green Grid; 11. maintaining the function and open character of a*



*sustainable Green Belt;”*

These statements help ensure that green infrastructure is an integral part of any future development, and re-iterate the need for this to be explicitly addressed within this section .

#### 4.2.1.1 Historic Environment Baseline

This section refers to *“More than 400 sites of archaeological interest and recorded on the Heritage Gateway in the Borough”*. The reference should be extended to also refer to the **Historic Environment Record** which is maintained **by Southend Museum**. The number of sites identified in the supporting documents suggests that there are 500 sites rather than the 400 in this document.

#### 4.3 Key Issues

This section just repeats the level of known heritage within the borough, and not what the particular issues might be. This should be expanded to include more detail on the issues, for example:

- Do the conservation area appraisals need updating?; and/or
- Are there any problems regarding scheduled monuments being encroached by development etc.?

### 5. ENVIRONMENTAL QUALITY

#### Context Review

The following document is applicable and should be included within the “regional” context:

#### 5.1.2 Regional

- **The Essex SuDS Design Guide (2016)** – The Essex SuDS Design guide provides local standards for water quality and water quantity from developments and guidance on SuDS design. (weblink: [SuDS design guide PDF, 15MB](#))

Any surface water proposals should be in accordance with the Essex SuDS Design Guide, to address any cross boundary matters in the event that surface water is discharged to any watercourses which go through Essex or ultimately end up discharging into Essex.

### 6. LAND, SOIL AND WATER RESOURCES

#### 6.1 National

Southend on Sea BC is the **Minerals Planning Authority** for the borough, and Section 13 of the NPPF “facilitating the sustainable use of minerals” (paragraphs 142-149) sets out the national policies for mineral provision. The NPPF paragraph 153 requires each local planning authority to produce a Local Plan for its area, and paragraph 156 sets out the strategic priorities for the area and specifically includes:

- *“the “provision of infrastructure for transport, telecommunications, waste management, water supply, waste water, flood risk and coastal changes management, and the provision of minerals and energy (including heat)”;*

In respect of the preparation of proportionate evidence base for Minerals, this is set out in paragraph 163 of the NPPF,

In light of national policies and guidance, ECC would expect the Local Plan Scoping Report and evidence to explicitly address the boroughs’ minerals related local plan responsibilities. This should be addressed within the chapter concerning “Land Soil and Water Resources”, and referenced within sections 3 – 5, 7 and 10 as appropriate to the local circumstances, including for example – policies regarding sustainable construction, opportunities for prior extraction; or transportation.



### 6.1.2 Regional

The following document is applicable and should be included within the “regional” context:

- The impacts of the [Essex Minerals Local Plan 2014](#) (adopted 8 July 2014) (MLP) and [Policies Map](#) in terms of allocated sites and mineral safeguarding should be referenced.
- Whilst the reference to the Essex and Southend Waste Local Plan is included within the “Regional” section - to reflect the adjoining
- **The Essex SuDS Design Guide (2016)** –The Essex SuDS Design guide provides local standards for water quality and water quantity from developments and guidance on SuDS design. Web link: [SuDS design guide PDF, 15MB](#)

The Essex SuDS Design Guide should be used when designing surface water drainage in the event that any surface water is going to be discharged to any watercourses which go through Essex or ultimately end up discharging into Essex.

- The South Essex Surface Water Management Plan should also be considered, see: [South Essex Surface Water Management Plan 2012](#)

Any surface water proposals should be in accordance with the Essex SuDS Design Guide, to address any cross boundary matters surface water is discharged to any watercourses which go through Essex or ultimately end up discharging into Essex.

### 6.1.3 Local

ECC recommend that the following text is inserted:

- ***Essex & Southend Waste Local Plan (adopted by Essex County Council July 2017, with Southend-on-Sea Council for adoption October 2017)***<sup>93</sup>: provides the key principles and policies to guide the future management of waste in the Plan area up until 2032. The plan recognises the need to move away from traditional forms of waste management towards greater levels of re-use, recycling and recovery. The plan provides a ‘Spatial Strategy’ which provides the means by which the Strategic Objectives are proposed to be met within the context of the plan area.

As referenced above and paragraph 2.1.3, the Essex and Southend Waste Local Plan (2017) should be specifically referenced within the “Local” context review, given that it covers the Local area, given the need for the policies and principles in the Waste Local Plan to feature “proactively” within the Scoping Report and the new Local Plan. This is particularly relevant to this section as it sets key measures including policies on the application of the waste hierarchy, sustainable construction etc. Hence there should be an explicit link to it and the inter-relationship of the new plan and the WLP.

ECC is concerned that there is a danger that the WLP and its wider elements could be missed otherwise, and there are still elements of your new local plan which need to draw on these principles, even though they would not need to duplicate details of the Waste Local Plan itself.

## 7 POPULATION AND COMMUNITIES

### 7.1.1 National

- **Education**

It is noted that Education is only briefly referenced within 7.1.1, 7.1.2, 9.1 and 11.1, and then within the SA objectives in 11.4.



There is a significant cross boundary flow of pupils between Southend on Sea and ECC, and in particular there is a high flow of pupils from Southend to Essex, of pupils who have failed to get in at their selective schools within Southend are seeking places in ECC's comprehensive system. This trend may not be able to continue, as the "Essex" places will be taken by increase in pupils as a result of the planned growth in the adjoining two tier area.

The current trends and cumulative future demand for school places should be explicitly addressed and factored within the IIA, including the SA objectives under 7.4, 9.4 and 11.4, to ensure there will be additional and inclusive education provision and places within Southend on Sea to meet the current and planned growth and requirements within the area.

#### 7.2.1.1

Please review the figures within Table 11, for example is the figure for white Irish figures in East and England and Southend correct? The totals for the respective columns exceed 100%.

## 8 HEALTH AND WELLBEING

The ECC Public Health team has reviewed the health elements of the Scoping Report, and would anticipate the Southend Public Health team to input into this report and the Local Plan.

ECC Public Health would welcome the opportunity to work with your respective health team to address any cross boundary issues regarding residents and communities, including the Health Impact Assessment and wider proposals including – for example:

- Proposals for developments that would impact ECC and SBC residents this including, housing and employment sites and associated employment opportunities.
- Connectivity of walking/cycling routes over the border and active travel. This is important as it increases opportunity for residents to be more physically active and support air quality. This is supported by Active Design principles which ECC Public Health is supporting alongside the Active Essex Strategy and the work of Active Essex.

ECC recommend that this is considered within objectives 8.4.

- Reference should also be made to the revised Essex Design Guide, being prepared by ECC on behalf of the Essex Planning Officers Association. ECC Public Health is an active party and has promoted the inclusion of health and wellbeing principles
- Reference should also be made to the Essex Planning Officers Association use of Health Impact Assessments which addresses health and wellbeing. W

Given the above, and requirements to health and Wellbeing in the NPPF, ECC would recommend the above references are incorporated as a source for encouraging health and wellbeing in planning.

## 9 EQUALITY, DIVERSITY AND INCLUSION

### 9.1.1 National

- **Education**

As stated above under 7.1.1, it is noted that Education is only briefly referenced within 7.1.1, 7.1.2, 9.1 and 11.1, however it is only briefly referenced within SA objectives 11.4.



There is a significant cross boundary flow of pupils between Southend on Sea and ECC, and in particular there is a high flow of pupils from Southend to Essex, of pupils who have failed to get in at their selective schools within Southend are seeking places in ECC's comprehensive system. This trend may not be able to continue, as the "Essex" places will be taken by increase in pupils as a result of the planned growth in the adjoining two tier area.

The current trends and cumulative future demand for school places should be explicitly addressed and factored within the IIA, including the SA objectives under 7.4, 9.4 and 11.4, to ensure there will be additional and inclusive education provision and places within Southend on Sea to meet the current and planned growth and requirements within the area.

## 10 TRANSPORT AND MOVEMENT

### 10.1.2 Regional

- Amend the text to read as follows:  
*Reference should be made to Local Transport Plan for Essex as the adjoining Highway and Transportation Authority. The following text is suggested:*

***The Local Transport Plan for Essex:** sets out the County Council's aspirations for improving travel in the County adjoining Southend on Sea Borough Council. The Priorities include providing for and promoting access by sustainable modes of transport to and from development areas; improving journey times on congested routes; improving the attractiveness of cycling; and improving access to green spaces. Consideration will also need to be given to other Non-Motorised Users (NMUs) such as equestrians, as well as ensuring the connectivity and accessibility between the sustainable transport modes."*

- SELEP – ECC recommends consideration should be given to the forthcoming new SELEP Strategic Economic Plan, due to be published in the first half of 2018.

### 10.1.3 Local

Reference should be made to the following documents:

- A127 Corridor for Growth: An Economic Plan 2014**, the Route Management Strategy for the A127 jointly prepared by ECC and SBC.
- A127 Statement of Common Ground, 2017**, Prepared for the Havering Local Plan (September 2017) and signed by Havering London Borough, SBC, ECC, Thurrock Council, Basildon BC, Brentwood BC, Castle Point BC and Rochford DC.

#### 10.2.1.1 Road Network and Congestion

The reference to the *Essex Transport Plan*<sup>174</sup>, should be amended to read "*Essex Local Transport Plan*<sup>174</sup>", to reflect its correct title.

#### 10.2.1.3 Walking and Cycling Network

Explicit reference should be made to the SEAT project – the joint South Essex project to promote cycling and services across south Essex at key centres.

#### 10.2.1.6

- Last sentence – states "The airport is also served well by the road network and can be reached by the A127, A12 or A13", however the A12 does not directly serve the Airport.

The following alternative text is recommended:



*“There are no motorways within Southend Borough. The main strategic routes in the District are the A130 which links Southend with Chelmsford and the A127 which links Southend-on-Sea with the M25.”*

*“There are good transport links to the airport at peak times with 8 trains per hour which run from Southend Airport Station to Central London. The journey time from London Liverpool Street Station is 53 minutes. The airport is also served well by the road network and can be reached by the A127, via the A12, A130 or A13. However, the A127 and A13 are both at or near capacity*

## **11.0 ECONOMY**

### **11.1.1 National**

- **Education**

As stated above under 7.1.1, it is noted that Education is only briefly referenced within 7.1.1, 7.1.2, 9.1 and 11.1, however it is only briefly referenced within SA objectives 11.4.

There is a significant cross boundary flow of pupils between Southend on Sea and ECC, and in particular there is a high flow of pupils from Southend to Essex, of pupils who have failed to get in at their selective schools within Southend are seeking places in ECC's comprehensive system. This trend may not be able to continue, as the “Essex” places will be taken by increase in pupils as a result of the planned growth in the adjoining two tier area.

The current trends and cumulative future demand for school places should be explicitly addressed and factored within the IIA, including the SA objectives under 7.4, 9.4 and 11.4, to ensure there will be additional and inclusive education provision and places within Southend on Sea to meet the current and planned growth and requirements within the area.

### **11.1.2 Regional**

- **Skills**

Given the Southend's comparatively low skills base and higher than average number of people claiming Job Seeker Allowance, it is considered that the Scoping Report falls short of recognising the need to enhance and support the full range of post-16 options including Apprenticeships, FE provision or sixth-form. With the raising of participation age educational opportunities need to be considered up to the age of 18.

Large scale developments could present an opportunity with Developers to drive forward traineeships as well as apprenticeships from level 2-higher or degree level.

The Scoping Report needs to be expanded to reference and recognise the need for adequate adult skills and looking to capitalise on the new National Retraining Scheme, especially when the population of the Borough is generally less qualified compared to regional and national figures.

It is considered that sole reliance on the SELEP Growth Deal for skills investment would be myopic and leveraging the new Local Plan to include post-16 provision would be appropriate. This would ensure sufficient choice of both academic and technical courses.

- 11.1.5 The references to the Med Tech Campus are noted however ECC seeks clarification on the statements regarding the SBC/ARU and the ARU branding of the Med Tech Campus in Southend. ECC seeks clarification question whether it would be more appropriate to focus on the MedTech sector only with no other branding, which may assist in the wider promotion of the sector



- 11.2 Please note that the Integrated County Strategy has been superseded by the Economic Plan for Essex 2014, and this should now be referenced

Further evidence is also available including the Essex Growth Commission, and ECC's Growth on Space study (2016). Reference could also be made to emerging documents such as the Thames Estuary 2050 Commission report expected in Spring 2018 and the final report of the Essex Growth Commission also expected in spring 2018

- 11.2 Given the comments above regarding the Medtech Campus, it is recommended that the bullet point is updated to solely refer to the Medtech Campus'.

## **12.0 NEXT STEPS**

### **12.1 Subsequent Stages for the IIA Process**

In the absence of a Sustainability Framework for the assessment of options for site allocation within the Scoping Report, it is recommended that the Next Steps section include commentary as to when and how a site assessment framework will be formulated.

### **12.2 Consultation on the Scoping Report**

A Factual update is suggested to reflect the additional DTC engagement undertaken with adjoining and partner local authorities in South Essex.



### General Comment

Please find enclosed a list of documents and links available at the National, Regional and Local level which for your information and action.

### **National:**

Please note PPS5 Practice Guide (2010) has been withdrawn by the government. The updated guidance can be found on the [Historic England website](#).

[DCLG National Planning Policy for Waste](#) (2013)

[Defra Waste Management Plan for England](#) (2013)

Department for Education (2014) [Home to school travel and transport guidance – Statutory guidance for local authorities](#)

[England's Biodiversity Strategy](#).

### **Essex County Council:**

- [Vision for Essex 2013-2017](#)
- [ECC Outcomes Framework, Sustainable Economic Growth for Essex Communities and Businesses \(Commissioning Strategy\) \(2014\)](#)
- [Economic Plan for Essex \(2014\)](#)

### Transport & Infrastructure

- [A127 Corridor for Growth - An Economic Plan 2014](#)
- [Essex Transport Strategy, the Local Transport Plan for Essex \(June 2011\)](#)
- [Super Fast Essex Broadband](#)
- [ECC Developers' Guide to Infrastructure Contributions](#)

### Education

- [Education Transport Policy, \(ECC, 2015\)](#)
- [Commissioning School Places in Essex 2014-19"](#)
- Early Year and Childcare: A key issue for ECC is to ensure there is a sufficient provision of primary, secondary, and Early Years and Childcare places, and that such places are located within walking distance of new housing development and, in particular via safe direct routes. It is not suitable to state new development is located within 30 minutes of community facilities, as this could imply 30 minutes by bus. For such a journey not only would ECC be responsible for the revenue costs but proximity to a school does not mean it has the capacity, or the scope to expand.

### Flood & Water Management

- [Essex Sustainable Urban Drainage Design Guide 2016](#)
- [Local Flood Risk Management Strategy](#), (ECC, February 2013). This document outlines ECCs approach to managing flood risk from surface and groundwater flooding, as well as flooding from ordinary watercourses.
- South Essex Surface Water Management Plan
- [South Essex Surface Water Management Plan 2012](#)
- <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

### Health and Wellbeing

- [ECC Independent Living Programme](#)

### Environment

- [Essex Rural Strategy](#) (2010)



- [South East Local Enterprise Partnership Rural Strategy 2015-2021](#) (2015)
- [Accessible Natural Greenspace Criteria](#) (ANGSt) by Essex Wildlife Trust.
- [England's Biodiversity Strategy](#). In August 2011 Defra published: "Biodiversity 2020: a strategy for England's Wildlife and Ecosystem Services". Biodiversity 2020 sets out how the quality of England's natural environment will be improved up to the year 2020, and develops policies introduced in the Natural Environment White Paper (published in June 2011). It also represents the government's response to international commitments agreed at the 2011 UN Convention on Biological Diversity. The strategy provides a detailed road map to halt the loss of biodiversity by 2020 and to strengthen and enhance ecosystem services. The importance of ecosystem services was highlighted in the UK National Ecosystem Assessment also published in June 2011.
- [The Natural Environment and Rural Communities Act 2006](#)  
Section 40 (S40) of the Act requires all public bodies to have regard to biodiversity conservation when carrying out their functions. Section 41 (S41) of the Act requires the Secretary of State to publish a list of habitats and species which are of principal importance for the conservation of biodiversity in England. The list is drawn up in consultation with Natural England, as required by the Act.
- Natural England and Defra state that the S41 list should be used to guide public bodies, including local planning authorities, in implementing their duty under S40 of the NERC Act. Fifty-six habitats of principal importance are included on the S41 list. These are the habitats in England that were identified as requiring action in the UK Biodiversity Action Plan (UK BAP) and continue to be regarded as conservation priorities in the subsequent UK Post-2010 Biodiversity Framework.
- Habitats of principal importance are referred to as 'Priority Habitats' in the NPPF. It should be noted that the 'UK Post-2010 Biodiversity Framework' has replaced the UK Biodiversity Action Plan (UKBAP); and UKBAP species and habitats should now be referred to as 'Species of Principal Importance' and 'Habitats of Principal Importance' under section 41 of the Natural Environment and Rural Communities Act 2006. The NPPF uses the simplified term 'Priority Species or Habitats'.
- The [State of Nature Report](#) should also be referred to. It provides quantitative assessments of the population or distribution trends of 3,148 species. Of these, 60% have declined over the last 50 years and 31% have declined strongly. Half of the species assessed have shown strong changes in abundance or distribution, indicating that recent environmental changes are having a dramatic impact on the UK's wildlife. There is also evidence to suggest that species with specific habitat requirements (i.e. those associated with Priority Habitats) are faring worse than generalist species (i.e. those associated with conventional farmland areas) that are better able to adapt to a changing environment. Whilst there is no similar systematic account of the wildlife in Essex, it can be assumed that UK trends are replicated locally.

#### Minerals and Waste

- The impacts of the [Essex Minerals Local Plan 2014](#) (adopted 8 July 2014) (MLP) and [Policies Map](#) in terms of allocated sites and mineral safeguarding in the District needs to be mentioned.
- [Joint Municipal Waste Management Strategy for Essex \(2007 to 2032\) \(ECC, 2008\)](#)  
This Strategy sets out the approach to dealing with Essex municipal waste up to 2032. It sets out a waste hierarchy which follows reduce, re-use, recycle, recover and dispose.  
The strategy sets out recycling targets which include recycling 60% of household waste by 2020 and reducing the amount of biodegradable waste sent to landfill to 131,386 tonnes by 2020 (386,319 tonnes were sent in the 2002 baseline year).  
The new Local Plan should seek to implement the waste hierarchy to ensure the amount of municipal waste is reduced.  
The SA framework should include objectives/indicators which ensure the amount of waste sent to landfill is reduced and encourage uptake of recycling and reuse of materials.



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15<sup>th</sup> December 2017

Dear Sir/Madam,

**Consultation Response to the Integrated Impact Assessment (IIA) Scoping Report  
for the Southend-on-Sea Local Plan, October 2017**

Thank you for consulting Basildon Borough Council on the Scoping Report for the Integrated Impact Assessment (IIA) of the Southend-on-Sea Local Plan. Please accept this letter as the response of Basildon Borough Council to the consultation.

Consideration has been given to the IIA Scoping Report, and we are pleased to see that the scope and level of information included in the report addresses the key issues impacting on your borough and neighbouring boroughs. We also note that matters of land use in relation to sustainability such as environmental quality, housing levels, economic growth, transport issues, recreational impacts, etc. have been identified within the Scoping Report. Basildon Council is therefore content with the sustainability topics and criteria that have been included in the Scoping Report.

Furthermore, it is recognised that while the Scoping Report identifies the nature and importance of these sustainability effects, additional work will be undertaken by Southend-on-Sea Borough Council to identify measures to mitigate them, to help ensure that the Council takes a properly informed decision when progressing its Local Plan.

I trust that this response will assist you in ensuring that the IIA Scoping Report supports the process of preparing the Southend-on-Sea Local Plan. In the meantime, if you have any queries related to the matters raised in this response, please do not hesitate to contact the planning policy team using the details provided at the top of this letter.

Yours sincerely,

Matthew Winslow BSc. MSc. MRTPI  
Service Manager – Strategic Planning and Regeneration Strategy





Southend-on-Sea Borough Council  
Planning Department  
PO Box 6  
Southend-on-Sea  
Essex  
SS2 6ER

**Our ref:** AE/2006/000317/SE-  
02/SP1-L01  
**Your ref:** TP/100/LP2017/DS  
**Date:** 04 December 2017

Dear Sir/Madam

## **SOUTHEND NEW LOCAL PLAN: INTEGRATED IMPACT ASSESSMENT SCOPING REPORT**

Thank you for the opportunity to comment on the Southend new local plan: integrated impact assessment scoping report. We have reviewed the document and have made comments in relation to flood risk, groundwater, contaminated land, waste water and biodiversity.

### **Flood Risk**

All development proposals within the Flood Zone (which includes Flood Zones 2 and 3, as defined by the Environment Agency) shown on the Policies Map and Local Maps, or elsewhere involving sites of 1ha or more, must be accompanied by a Flood Risk Assessment.

### **Planning Practice Guidance (PPG)**

The Local Plan should apply the sequential test and use a risk based approach to the location of development. The plan should be supported by a Strategic Flood risk Assessment (SFRA) and should use the NPPF Planning Practice Guidance (PPG). The PPG advises how planning can take account of the risks associated with flooding and coastal change in plan-making and the planning application process. The following advice could be considered when compiling the Local Plan to ensure potential development is sequentially sited or if at flood risk it is designed to be safe and sustainable into the future.

### **Sequential Approach**

The sequential approach should be applied within specific sites in order to direct development to the areas of lowest flood risk. If it isn't possible to locate all of the



development in Flood Zone 1, then the most vulnerable elements of the development should be located in the lowest risk parts of the site. If the whole site is at high risk (Flood Zone 3), an FRA should assess the flood characteristics across the site and direct development towards those areas where the risk is lowest.

### Finished Floor Levels

We strongly advise that proposals for "more vulnerable" development should include floor levels set no lower than 300 millimetres above the level of any flooding that would occur in a 1% (1 in 100) / 0.5% (1 in 200) Annual Exceedence Probability (AEP) flood event (including allowances for climate change). We are likely to raise an objection where this is not achieved in line with Paragraphs 060 of the NPPF's Planning Practice Guidance which advises that there should be no internal flooding in more vulnerable developments from a design flood.

We recommend "less vulnerable" development also meet this requirement to minimise disruption and costs in a flood event. If this is not achievable then it is recommended that a place of refuge is provided above the 0.1% AEP flood level.

### Safe Access

During a flood, the journey to safe, dry areas completely outside the 1% (1 in 100) / 0.5% (1 in 200) AEP flood event, including allowances for climate change, should not involve crossing areas of potentially fast flowing water. Those venturing out on foot in areas where flooding exceeds 100 millimetres or so would be at risk from a wide range of hazards, including, for example; unmarked drops, or access chambers where the cover has been swept away. Safe access and egress routes should be assessed in accordance with the guidance document '[FD2320 \(Flood Risk Assessment Guidance for New Developments\)](#)'. We would recommend that you refer your SFRA which has produced hazard maps following a breach/overtopping of the defences?

### Emergency Flood Plan

Where safe access cannot be achieved, or if the development would be at residual risk of flooding in a breach, an emergency flood plan that deals with matters of evacuation and refuge should demonstrate that people will not be exposed to flood hazards. The emergency flood plan should be submitted as part of a FRA and will need to be agreed with yourselves. As stated above refuge should ideally be located 300mm above the 0.1% AEP flood level including allowances for climate change. If you do produce a flood safety framework as mentioned above, it will be important to ensure emergency planning considerations and requirements are used to inform it.

### Flood Resilience / Resistance Measures

To minimise the disruption and cost implications of a flood event we encourage development to incorporate flood resilience/resistance measures up to the extreme 0.1% AEP climate change flood level. Information on preparing property for flooding can be found in the documents '[Improving the Flood performance of new buildings](#)' and '[Prepare your property for flooding](#)'.

### Betterment

Every effort should be made by development to improve the flood risk to the local area, especially if there are known flooding issues. Opportunities should also be taken to



provide environmental enhancements as part of the design, for example naturalising any rivers on the site with a buffer zone on both sides.

#### Increases in Built Footprint (excluding open coast situations)

When developing in areas at risk of flooding consideration should be given to preventing the loss of floodplain storage. Any increase in built footprint within the 1% AEP, including allowances for climate change, flood extent will need to be directly compensated for to prevent a loss of floodplain storage. If there are no available areas for compensation above the design flood level and compensation will not be possible then a calculation of the offsite flood risk impacts will need to be undertaken. If this shows significant offsite impacts then no increases in built footprint will be allowed. Further guidance on the provision of compensatory flood storage is provided in section A3.3.10 of the CIRIA document C624.

#### Climate Change

The Environment Agency guidance 'Flood risk assessments: climate change allowances' should be used to inform the spatial distribution of growth and the requirements of Flood Risk Assessments (FRA) for individual applications.

The National Planning Practice Guidance provides advice on what is considered to be the [lifetime of the development in the context of flood risk and coastal change](#). The 'Flood risk assessments: climate change allowances' guidance provides allowances for future sea level rise, wave height and wind speed to help planners, developers and their advisors to understand likely impact of climate change on coastal flood risk. It also provides peak river flow and peak rainfall intensity allowances to help planners understand likely impact of climate change on river and surface water flood risk. For some development types and locations, it is important to assess a range of risk using more than one allowance. Please refer to this guidance.

<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>. This advice updates previous climate change allowances to support NPPF and may result in flood extents being greater than they have been in the past. This does not mean out flood map for planning has changed, as these maps do not consider climate change, but fluvial flood maps that may have been produced as part of SFRAs and other flood risk studies may be out of date. FRAs submitted in support of new development will need to consider the latest climate change allowances.

#### Environmental Permit for Flood Risk Activities

An environmental permit for flood risk activities may be required for work in, under, over or within 8 metres (m) from a fluvial main river and from any flood defence structure or culvert or 16m from a tidal main river and from any flood defence structure or culvert.

Application forms and further information can be found at:

<https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>. Anyone carrying out these activities without a permit where one is required, is breaking the law. The Local Plan should consider this when allocating development sites adjacent to a 'main river'. A permit may be required and restrictions imposed upon the work as a result in order to ensure the development does not have a detrimental impact upon the environment and flood risk<sup>3</sup>.



## Flood Risk - Informative

- We have a new model for Eastwood brook. This model has already been requested to be used in the SFRA update that is currently in process.
- There is no mention of TE2100 (P4) Policy for Leigh & Southend. Nor the SMP – which is Hold the Line Essex and South Suffolk

## **Groundwater and contaminated Land**

### Section 5.2.1.2 Water Quality

The water quality section refers to Source Protection Zones and how there are none within the Southend Borough Council boundary. There are however, superficial River Terrace Gravels deposits which are designated as Secondary A aquifers. These deposits are often important in providing recharge to surface waters and their presence and need for protection should be considered in the document. The superficial deposits overlie the London Clay Formation, an unproductive deposit. Beneath which, the Chalk Formation, a principal aquifer is present.

### Section 6.1 Context Review

Whilst Section 6.1 refers to the requirements of the NPPF with regard to land contamination, reference should be made within Section 6.2.2 as to how the local authority will deal with land contamination to ensure the protection of human health, ecological systems, property and the environment. The policy should refer to a tiered or phased approach to the development of contaminated land which meets with good practice (including CLR11):

1. A Preliminary Risk Assessment (PRA) which has identified all previous uses and contaminants associated with those uses. A conceptual model of the site identifying sources, pathways and receptors and any unacceptable risks arising from contamination at the site.
2. A site investigation and detailed assessment of risk to all potential receptors both on and off site.
3. An options appraisal and remediation strategy giving details of remediation measures proposed and how they will be undertaken.
4. A verification report demonstrating completion of the remedial works.

The Scoping Report should also consider the use of SuDS in relation to future developments. Whilst we support the use of SuDS, the use of infiltration SuDS must ensure that groundwater quality is not negatively impacted. Planning applications should include appropriate pollution prevention measures in line with [CIRIA C753](#), in particular Table 26.1, when designing a surface water management scheme.

Furthermore, due to their high risk of pollution, as a rule we do not support the use of deep infiltration devices such as boreholes. The Plan should encourage the use of shallow infiltration devices with appropriate pollution prevention measures. Where these are not possible, a discharge to watercourse or sewer should be explored prior to considering deep infiltration devices ([Groundwater Protection Position Statements](#) G1 and G9 to G13).



## **Waste Water**

The provision of infrastructure for waste water should be considered by local councils. Overloaded or inadequately treated waste water poses a risk to human health and could harm the water environment by reducing water quality. This would also impact on the ability of water bodies to meet the water quality objectives in the Water Framework Directive (WFD). We would recommend that contact should be made with providers to ensure ongoing monitoring of waste water capacity as development is brought forward.

## **Biodiversity**

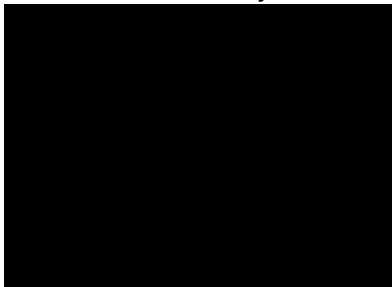
Opportunities should be sought to improve the environment as new development is brought forward. Landscaping proposals should demonstrate that thought has been given to maximizing potential ecological enhancements. Paragraph 9 of the NPPF sets out that planning should seek positive improvements and include an aim to move from a net loss of biodiversity to achieving net gains. This presents an opportunity to provide multi-functional benefits – providing open spaces for residents, sustainable transport links and climate change resilience.

Green infrastructure, defined as a network of new and existing multi-functional green space and features, such as ecological corridors or other appropriate planting, should be considered in new developments. Incorporating green and / or brown roofs and walls can be a particularly effective measure. They provide urban habitats, increased energy efficiency of buildings and attenuation of rain water.

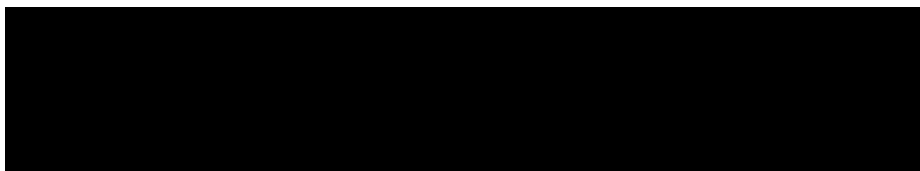
Please note that the views expressed in this letter are a response to the integrated impact assessment scoping report for Southend only and do not represent our final view in relation to any future planning or permitting applications that may come forward.

We trust this information is useful.

Yours faithfully



**Planning Advisor**







Historic England

Southend-on-Sea Borough Council  
Department of Place  
Floor 13 Civic Centre  
Victoria Avenue  
Southend-on-Sea  
SS2 6ER

Our ref: PL00222202

Telephone: [REDACTED]

[REDACTED]

07 December 2017

Dear Sir/Madam,

## **Re. Southend-on-Sea Integrated Impact Assessment (IIA) Scoping Report**

Thank you for consulting Historic England on Southend's publication draft Integrated Impact Assessment Scoping (IIA) Report. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore we welcome the opportunity to comment on the IIA Scoping Report. We have now had the opportunity to review the document and can provide the following substantive comments.

The draft scoping report proposes a set of objectives and indicators against which the council will appraise the environmental, social and economic sustainability impacts as well as the equalities, health, and crime and disorder effects of its policies. The Scoping Report is not an Integrated Impact Assessment Report – but forms the first stage in the preparation of an integrated impact assessment.

### **General Comments**

Historic England has published guidance on Sustainability Appraisals, which contains details on baseline information, sustainability issues and objectives, indicators and monitoring that will be relevant to the IIA. This document can be found here:



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU  
Telephone 01223 58 2749 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.  
Correspondence or information which you send us may therefore become publicly available.







*Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment:* <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

## **Comments on Scoping Report**

### **Section 4.1: Context Review**

The Context Review does not consider international level policies and statute which is relevant. There are a number of other relevant plans and programmes that should be included:

- UNESCO World Heritage Convention
- European Landscape Convention
- The European Convention on the Protection of Archaeological Heritage
- Convention for the Protection of the Architectural Heritage of Europe
- Planning (Listed Buildings & Conservation Areas) Act 1990
- Ancient Monuments & Archaeological Areas Act 1979

Identification of the NPPF as the main national level policy is correct but the supporting text makes no reference to the NPPF requirement to conserve and enhance the historic environment in line with paragraph 156 of the NPPA. This section IIA consultation document is overly focused on landscape and does not adequately recognise the historic environment as a main strand of sustainable development as outlined in paragraph 7 of the NPPF.

There is some concern regarding the referencing of the 2010 “*Government’s Statement on the Historic Environment for England*”. Whilst this document has not been archived, it is out of date and pre-dates the NPPF, for example it references PPS’s which have now no longer exist. The Culture White Paper, published by the current government would be the first reference point for current government thinking. We would recommend that this document is not referred to as it is not an actual policy of piece or statue and does not reflect the NPPF.

### **Section 4.2: Baseline Review**

Paragraph 4.2.1.1 outlines the numbers of scheduled monuments, conservation areas, and Grade I and II\* listed buildings within the Borough which is a helpful and







useful starting point. However, locally listed buildings and Grade II listed buildings should also be referred to. The Heritage Gateway is also referenced as source of baseline information which is very much welcomed and should help give a more accurate picture of the Borough's historical significance. The consultation document also recognises the potential for undiscovered non-designated heritage assets to be present within the Borough, specifically in relation to archaeological remains, the extent of which is recognised as being unknown in the IIA consultation documents.

In terms of evidence it would be helpful to identify which Grade II buildings and buildings of local importance as "at risk", as the national register does not cover these heritage assets (it only covers Grade I and Grade II\* buildings, scheduled monuments, conservation areas and registered parks and gardens).

We would suggest that the local conservation officer will be well placed to ensure appropriate consideration of historic building/archaeological issues and would request their involvement from this point in the process. The local Historic Environment Record (HER) should form part of the baseline evidence with regards to the historic environment.

## **Section 4.4: IIA Objectives**

Historic England generally agrees with the cultural heritage IIA objectives, particularly reference to the historic environment and setting.

We welcome a standalone alone objective based on heritage we request the following amendments:

- As above we request that this is amended to states "historic environment". The wording of the objective should be amended to states "to protect or enhance" rather than "protect and enhance" in order to be consistent with the statutory obligations embodied in the Planning (Listed Buildings & Conservation Areas) Act 1990.
- The objective should be amended to include reference to the settings of designated and non-designated heritage assets and archaeological sites.

The Assessment Questions listed are appropriate. It would however be helpful if a question was added which sought to explore the ability of the emerging Plan to deal with the effects of development on unknown or undiscovered heritage assets. For example, how will the plan deal with development proposals in areas with archaeological potential but with no known designated or non-designated heritage





assets and does the Plan outline how this situation is to be addressed by prospective applicants?

## Section 12: Consultation and next steps

We welcome the statement in section 12.2 which identifies Historic England as a statutory consultee.

The emerging Local Plan offers the opportunity to review the historic environment elements of the existing adopted development plan, from the evidence base to specific policies and proposals.

Historic England look forward to being involved in future Local Plan consultations. We have produced guidance relating to Local Plans which you may find helpful:

*Historic Environment Good Practice Advice in Planning 1: The Historic Environment in Local Plans:* <https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>

## Indicators and Monitoring

The IIA Scoping Report contains no information on monitoring and indicators. The SA is the principle tool for monitoring the effects of a local plan in operation so the indicators we would expect to see in an SA should also be present in the IIA. Monitoring should seek to identify unforeseen adverse effects and enable appropriate remedial action regarding the plan's implementation. Guidance on indicators and monitoring in respect of the historic environment can be found in advice note listed earlier in this letter.

Please note that absence of a comment on an allocation or document in this letter does not mean that Historic England is content that the allocation or document forms part of a positive strategy for the conservation and enjoyment of the historic environment or is devoid of historic environment issues. Where there are various options proposed for a settlement, identification of heritage issues for a particular allocation does not automatically correspond to the support for inclusion of the alternative sites, given we have not been able to assess all of the sites.

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse







Historic England

effect upon the historic environment. We hope that the above comments are of assistance.

Yours sincerely,

Historic Environment Planning Advisor



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Telephone 01223 58 2749 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

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Correspondence or information which you send us may therefore become publicly available.





Date: 19 December 2017  
Our ref: 230846  
Your ref: TP/100/LP2017/DS



[REDACTED]  
[REDACTED]  
Strategic Planning  
Southend-on-Sea Borough Council

**BY EMAIL ONLY**

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

Dear [REDACTED]

**Integrated Impact Assessment (IIA) for the Southend-on-Sea Local Plan  
IIA Scoping Report Southend-on-Sea Borough Council October 2017**

Thank you for seeking our advice on the scope of the Integrated Impact Assessment (IIA). Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England agrees with the overall IIA scoping approach, and the present report appears fit for purpose. Case law<sup>1</sup> and guidance<sup>2</sup> has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Integrated Impact Assessment (EIA) for this development.

We note that we could not find reference to the Essex and South Suffolk Shoreline Management Plan, which is relevant to several of the themes explored in the document.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact John Jackson on 020 080 264 866. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

[REDACTED]  
Lead Adviser Sustainable Development

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<sup>1</sup> Harrison, J in *R. v. Cornwall County Council ex parte Hardy* (2001)

<sup>2</sup> *Note on Environmental Impact Assessment Directive for Local Planning Authorities* Office of the Deputy Prime Minister (April 2004) available from <http://webarchive.nationalarchives.gov.uk/+http://www.communities.gov.uk/planningandbuilding/planning/sustainability/environmental/environmentalimpactassessment/noteenvironmental/>



## **Annex A – Advice related to EIA Scoping Requirements**

### **1. General Principles**

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2011, sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the proposed development.
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen.
- A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the interrelationship between the above factors.
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium and long term, permanent and temporary, positive and negative effects. Effects should relate to the existence of the development, the use of natural resources and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment.
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.
- A non-technical summary of the information.
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

### **2. Biodiversity and Geology**

#### **2.1 Ecological Aspects of an Environmental Statement**

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EclA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

EclA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

The National Planning Policy Framework sets out guidance in S.118 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

#### **2.2 Internationally and Nationally Designated Sites**

The ES should thoroughly assess the potential for the proposal to affect designated sites. European sites (eg designated Special Areas of Conservation and Special Protection Areas) fall within the scope of the Conservation of Habitats and Species Regulations 2010. In addition paragraph 118 of the National Planning Policy Framework requires that potential Special Protection



Areas, possible Special Areas of Conservation, listed or proposed Ramsar sites, and any site identified as being necessary to compensate for adverse impacts on classified, potential or possible SPAs, SACs and Ramsar sites be treated in the same way as classified sites.

Under Regulation 61 of the Conservation of Habitats and Species Regulations 2010 an appropriate assessment needs to be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site.

Should a Likely Significant Effect on a European/Internationally designated site be identified or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.

### **Sites of Special Scientific Interest (SSSIs) and sites of European or international importance (Special Areas of Conservation, Special Protection Areas and Ramsar sites)**

**These are listed in the IIA scoping document. We note that Southend on Sea foreshore LNR is also a Site of Special Scientific Interest.**

- Further information on the SSSI and its special interest features can be found at [www.magic.gov](http://www.magic.gov). The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within Click here to enter text. and should identify such mitigation measures as may be required in order to avoid, minimise or reduce any adverse significant effects.
- Natura 2000 network site conservation objectives are available on our internet site [here](http://publications.naturalengland.org.uk/category/6490068894089216): <http://publications.naturalengland.org.uk/category/6490068894089216>

### **2.3 Regionally and Locally Important Sites**

The EIA will need to consider any impacts upon local wildlife and geological sites. Local Sites are identified by the local wildlife trust, geoconservation group or a local forum established for the purposes of identifying and selecting local sites. They are of county importance for wildlife or geodiversity. The Environmental Statement should therefore include an assessment of the likely impacts on the wildlife and geodiversity interests of such sites. The assessment should include proposals for mitigation of any impacts and if appropriate, compensation measures. Contact the local wildlife trust, geoconservation group or local sites body in this area for further information.

### **2.4 Protected Species - Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2010**

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*. The area likely to be affected by the proposal should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.



In order to provide this information there may be a requirement for a survey at a particular time of year. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and where necessary, licensed, consultants. Natural England has adopted [standing advice](#) for protected species which includes links to guidance on survey and mitigation.

## **2.5 Habitats and Species of Principal Importance**

The ES should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, published under the requirements of S41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available in the Defra publication '[Guidance for Local Authorities on Implementing the Biodiversity Duty](#)'.

Government Circular 06/2005 states that Biodiversity Action Plan (BAP) species and habitats, 'are capable of being a material consideration...in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

Natural England advises that a habitat survey (equivalent to Phase 2) is carried out on the site, in order to identify any important habitats present. In addition, ornithological, botanical and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present. The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (eg from previous surveys);
- Additional surveys carried out as part of this proposal;
- The habitats and species present;
- The status of these habitats and species (eg whether priority species or habitat);
- The direct and indirect effects of the development upon those habitats and species;
- Full details of any mitigation or compensation that might be required.

The development should seek if possible to avoid adverse impact on sensitive areas for wildlife within the site, and if possible provide opportunities for overall wildlife gain.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of priority habitat for the area under consideration.

## **2.6 Contacts for Local Records**

Natural England does not hold local information on local sites, local landscape character and local or national biodiversity priority habitats and species. We recommend that you seek further information from the appropriate bodies (which may include the local records centre, the local wildlife trust, local geoconservation group or other recording society and a local landscape characterisation document).

## **3. Designated Landscapes and Landscape Character**

### **Landscape and visual impacts**

Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development site as well as any relevant management plans or strategies pertaining to the area. The EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography. The European Landscape Convention places a duty on Local Planning Authorities to consider the impacts of landscape when exercising their functions.

The EIA should include a full assessment of the potential impacts of the development on local



landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character, as detailed proposals are developed.

Natural England supports the publication *Guidelines for Landscape and Visual Impact Assessment*, produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition). The methodology set out is almost universally used for landscape and visual impact assessment.

In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials. The Environmental Impact Assessment process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England advises that the cumulative impact assessment should include other proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

The assessment should refer to the relevant [National Character Areas](#) which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page.

### **Heritage Landscapes**

You should consider whether there is land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific or historic interest. An up-to-date list may be obtained at [www.hmrc.gov.uk/heritage/lbsearch.htm](http://www.hmrc.gov.uk/heritage/lbsearch.htm) and further information can be found on Natural England's landscape pages [here](#).

### **4. Access and Recreation**

Natural England encourages any proposal to incorporate measures to help encourage people to access the countryside for quiet enjoyment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways are to be encouraged. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

### **Rights of Way, Access land, Coastal access and National Trails**

The EIA should consider potential impacts on access land, public open land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the adjacent/nearby [Click here to enter text](#). National Trail. The National Trails website [www.nationaltrail.co.uk](http://www.nationaltrail.co.uk) provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts. We also recommend reference to the relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

### **5. Soil and Agricultural Land Quality**

Impacts from the development should be considered in light of the Government's policy for the protection of the best and most versatile (BMV) agricultural land as set out in paragraph 112 of the



NPPF. We also recommend that soils should be considered under a more general heading of sustainable use of land and the ecosystem services they provide as a natural resource in line with paragraph 109 of the NPPF.

As identified in the NPPF new sites or extensions to new sites for peat extraction should not be granted permission by Local Planning Authorities or proposed in development plans.

## **6. Air Quality**

Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition ([England Biodiversity Strategy](#), Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System ([www.apis.ac.uk](http://www.apis.ac.uk)). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

## **7. Climate Change Adaptation**

The [England Biodiversity Strategy](#) published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' ([NPPF](#) Para 109), which should be demonstrated through the ES.

## **8. Cumulative and in-combination effects**

A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

The ES should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment, (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, ie projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.



By Email Only

Ask for: [REDACTED]

Direct Dial: [Enter DD]

Email: [REDACTED]

My Ref: [Enter Ref.]

Your Ref: [Enter Your Ref.]  
[Enter Your Ref.]

Date: 6<sup>th</sup> December 2017

Dear [REDACTED]

**Southend new Local Plan – Integrated Impact Assessment Scoping Report**

Thank you for consulting Rochford District Council on the Southend-on-Sea Borough Council's Integrated Impact Assessment Scoping Report prepared in support of its emerging new Local Plan.

Having reviewed the Integrated Impact Assessment (IIA) Scoping Report for the Southend-on-Sea emerging new Local Plan Rochford District Council is satisfied that the appropriate scope and level of detail of the information needed to help identify the emerging new Local Plan's likely significant effects when judged against reasonable alternatives has been properly outlined. The evidence base reviewed, the key issues identified and the IIA Framework proposed in the Scoping Report are comprehensive and relevant as a focus for the assessment of the emerging Local Plan.

Rochford District Council, therefore, has no objection to the content of the IIA Scoping Report and for the Scoping Report to be used to appraise the emerging Local Plan.

I trust our comments are helpful.

Yours sincerely

[REDACTED]



## **Assistant Director – Planning Services**