

Integrated Impact Assessment (IIA) for the Southend-on-Sea Local Plan

Interim IIA Report

Southend-on-Sea Borough Council

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Quality information

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1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake an independent Integrated Impact Assessment (IIA) in support of Southend-on-Sea Borough Council's emerging new Local Plan (hereafter referred to as the 'Local Plan'). IIA fulfils the requirements and duties for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA).

IIA explained

- 1.2 IIA is a mechanism for considering and communicating the impacts of an emerging plan, and potential alternatives in terms of key sustainability issues. The aim of IIA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts and maximising positive impacts. Through this approach, the IIA for the Local Plan seeks to maximise the developing plan's contribution to sustainable development.
- 1.3 As identified above, the IIA seeks to fulfil the requirements and duties for SA, SEA, EqIA and HIA. The approach is to fully integrate these components to provide a single assessment process to inform the development of the new Local Plan. A description of each of the various components and their purposes is provided below.

Sustainability Appraisal (SA)

- 1.4 SA is undertaken to address the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive¹. It also widens the scope of the assessment from focusing largely on environmental issues to further consider social and economic issues. SA is a legal requirement for Local Plans.
- 1.5 The National Planning Practice Guidance (NPPG) states that "the role of the Sustainability Appraisal is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives."²
- 1.6 In line with the requirements of the SEA Directive, the two key steps in SA are that:
1. When deciding on 'the scope and level of detail of the information' which must be included in the SA Report there is a consultation with nationally designated authorities concerned with environmental issues; and
 2. A report (the 'SA Report') is published for consultation alongside the Draft Plan that presents an assessment of the Draft Plan (i.e. discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.
- 1.7 This Interim Report is concerned with the reasonable alternatives that have been identified and considered at this Regulation 18 stage in the plan making process. The assessment of these alternatives will help inform the local planning authority's choice of preferred approach. This stage should also involve considering ways of mitigating any adverse effects, maximising beneficial effects and identifying ways of monitoring likely significant effects.
- 1.8 The NPPG states that, "*The development and appraisal of proposals in Local Plan documents should be an iterative process, with the proposals being revised to take account of the appraisal findings. This should inform the selection, refinement and publication of proposals*".

¹ Directive 2001/42/EC

² Department for Communities and Local Government (2015) Planning Practice Guidance Strategic environmental assessment and sustainability appraisal Para 001 Reference ID: 11-001-20140306 [online] available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> Accessed Dec 2018

- 1.9 It also states more widely that the SA “*should identify, describe and evaluate the likely significant effects on environmental, economic and social factors using the evidence base*”.³ Criteria for determining the likely significance of effects on the environment are set out in schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004.

Equalities Impact Assessment (EqIA)

- 1.10 As a public-sector organisation, Southend-on-Sea Borough Council has a duty under the Equality Act 2010⁴ and associated Public Sector Equality Duty (PSED) to ensure that the objectives and policy options within the Local Plan avoid unlawful discrimination (direct and indirect), as well as advancing equality of opportunity and fostering good relations between those with protected characteristics⁵ and all others. An Equality Impact Assessment (EqIA) is often used by public sector organisations to demonstrate how this duty has been met.

Health Impact Assessment (HIA)

- 1.11 There are numerous links to planning and health highlighted throughout the NPPF (2018). The NPPG states that Local Planning Authorities (LPAs) should ensure that health and wellbeing, and health infrastructure are considered in Local Plans and in planning decision-making.⁶ A Health Impact Assessment (HIA) is a tool used to identify and assess the potential impacts of a plan and to inform decision-making.
- 1.12 In 2008, the Essex Planning Officers Association (EPOA) produced guidance on HIA.⁷ Since then the evidence around the influence of place and environment has grown with new publications, guidance and evidence emerging on a regular basis. This includes the development of HIA tools by bodies such as the London Health Urban Development Unit (HUDU)⁸, HIA becoming statutory for developments in Wales, the introduction of various forms of health and planning guidance and the introduction of Human Health into Environmental Impact Assessments.
- 1.13 In response to this changing evidence, EPOA has now up-dated the previous HIA guidance to ensure it is relevant for spatial planning today. This document (HIA with associated Essex Healthy Places Guidance Notes, 2018) with support from a variety of partners and stakeholders, has been designed to assist those working in this field to deliver healthier development. The document seeks to provide clarity on what health and wellbeing teams do, provide details of different contacts in health that may need to be engaged in planning, provide information on health issues that developments may consider supporting and guidance on health impact assessments.

This Interim IIA Report

- 1.14 This Interim IIA Report is published alongside the Issues and Options Document, under Regulation 18 of the Local Planning Regulations. The legally required IIA Report will be published subsequently, alongside the final draft (‘Pre-Submission’) version of the Local Plan, under Regulation 19 of the Local Planning Regulations.

³ Department for Communities and Local Government (2015) Planning Practice Guidance Strategic environmental assessment and sustainability appraisal Para 014 Reference ID: 11-001-20140306 [online] available at: http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-local-plans/#paragraph_013 Accessed Dec 2018

⁴ Equality Act 2010 [online] available at: <http://www.legislation.gov.uk/ukpga/2010/15/contents>

⁵ Protected characteristics under the Equality Act 2010 include age, sex, marital status, disability, gender reassignment, ethnicity, religion, pregnancy and maternity, sexual orientation and deprived/disadvantaged groups.

⁶ National Planning Practice Guidance. Paragraph: 001 Reference ID: 53-001-20140306 [online] available at: <https://www.gov.uk/guidance/health-and-wellbeing>

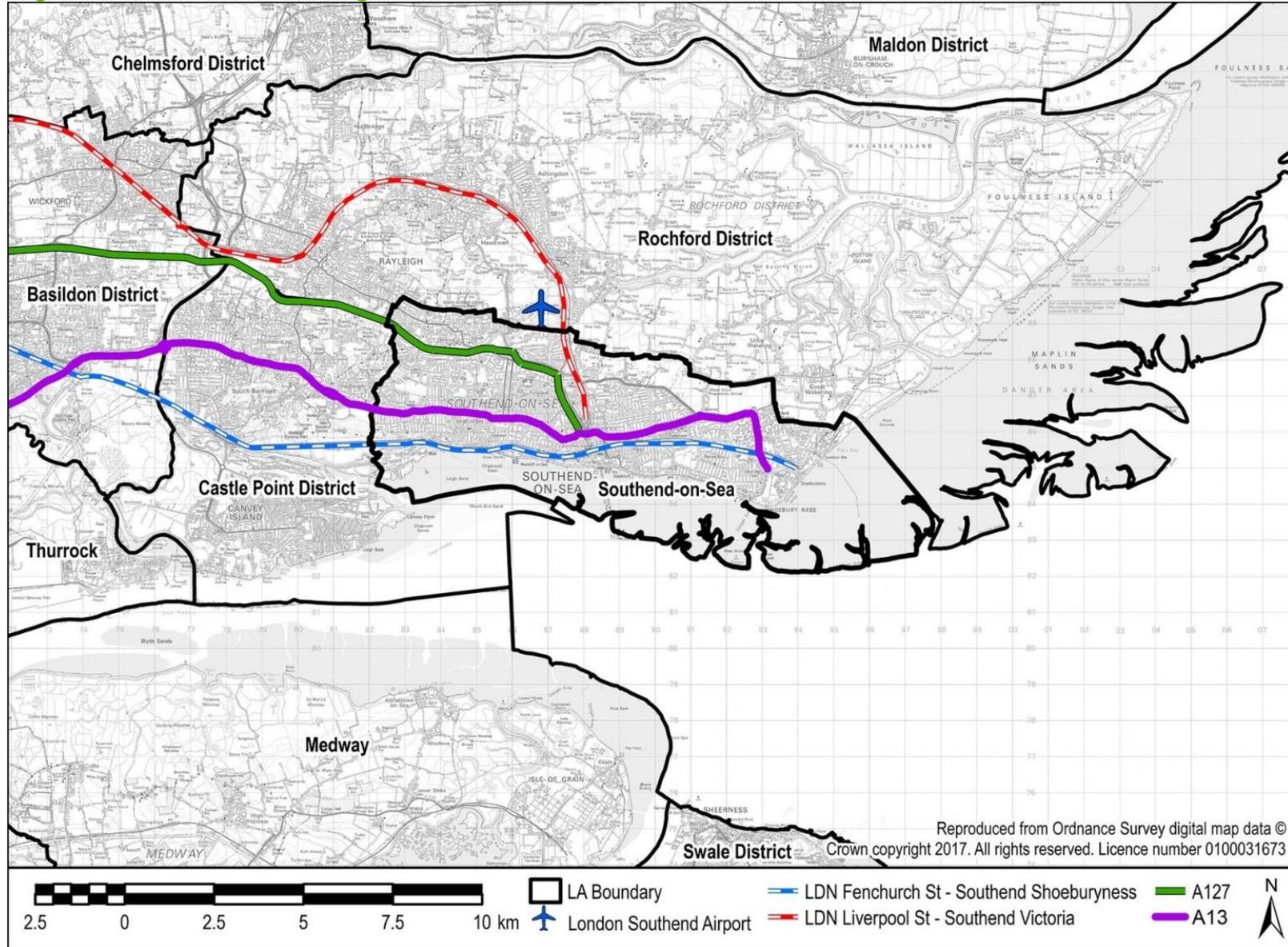
⁷ Essex Planning Officer’s Association (2008) Guidance Note: Health Impact Assessments (HIA’s)

⁸ NHS London Healthy Urban Development Unit (2017) HUDU Planning for Health Rapid Health Impact Assessment Tool.

Southend-on-Sea Borough's new Local Plan

- 1.15 The Council is in the process of producing a new Local Plan in line with policy and guidance changes at the national and local level, which includes the publication of the National Planning Policy Framework (NPPF), National Planning Practice Guidance (NPPG) and updated evidence (including the South Essex Strategic Housing Market Assessment and Addendum). The new Local Plan will include strategic and detailed planning and development management policies, land allocations for housing, employment and mixed use and will identify areas in the borough for protection. The area covered by the Local Plan can be seen in **Figure 1**.
- 1.16 The new Local Plan is being prepared in the context of the emerging South Essex Joint Strategic Plan (JSP), which seeks to deliver upon the 'South Essex 2050 Ambition' (SE2050). This is a long-term growth ambition being developed by the South Essex Local Authorities, that underpins the strategic spatial, infrastructure and economic priorities across the sub-region.
- 1.17 In January 2018, Basildon Borough Council, Brentwood Borough Council, Castle Point Borough Council, Rochford District Council, Southend-on-Sea Borough Council, Thurrock Borough Council and Essex County Council formed the Association of South Essex Local Authorities (ASELA) to ensure that implementation of the SE2050 Ambition has strong leadership and is managed on a truly collaborative basis.
- 1.18 The spatial strategy to implement the SE2050 Ambition is being implemented through a new planning 'portfolio' with the JSP currently being prepared to provide the overarching framework. It is considered that the constituent Local Plans and other place-shaping tools will be used to deliver this on the ground, using the range of planning tools available in a more flexible and responsive way.

Figure 1: Southend-on-Sea Borough



Issues and Options Document

- 1.19 The Issues and Options Document represents the Council's first public stage of plan preparation in accordance with the Town and Country Planning Regulations (2012). In line with Regulation 18, the Council is undertaking this consultation to inform future stages in the preparation of the Local Plan.
- 1.20 The Issues and Options Document addresses a number of key borough-wide challenges in preparing the new Local Plan and planning positively for growth in homes, jobs and associated infrastructure. It proposes twelve key issues for discussion organised under five sections. These include options for policies which may be needed in the Local Plan to deliver sustainable growth, high quality design, jobs and economic activity and protection of the natural and built environment.

What is the scope of the IIA?

Scoping

- 1.21 The aim here is to introduce the reader to the scope of the IIA, i.e. the integrated sustainability, equalities and health objectives that should be a focus of (and provide a broad methodological framework for) IIA. Further information on the scope of the IIA - i.e. a more detailed review of issues/objectives as highlighted through a review of the 'context' and 'baseline' - is presented in the IIA Scoping Report (2017).
- 1.22 The Regulations require that "When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the IIA scope], the responsible authority shall consult the consultation bodies". In England, the consultation bodies are the Environment Agency, Historic England and Natural England. A Scoping Report was sent to the statutory consultees for comment and published on the Council's website in October 2017.⁹ The responses received have been taken into account and amendments made to the baseline information and IIA Objectives where necessary.

IIA Objectives

- 1.23 **Table 1** presents the IIA Objectives - grouped under ten topic headings - established through IIA scoping, i.e. in light of context/baseline review, identified key issues and responses from statutory consultees.
- 1.24 Taken together, the IIA topics and draft objectives presented in **Table 1** provide a methodological 'framework' for appraisal.

Table 1: IIA Objectives

IIA Objectives	Assessment questions
Biodiversity	
Protect and enhance biodiversity within and surrounding the borough.	Will the option/proposal help to:
<i>Relevant SEA Topics:</i> <i>Biodiversity, flora & fauna</i>	<ul style="list-style-type: none"> • Minimise impacts on biodiversity and provide net gains where possible? • Protect and enhance ecological networks, including those that cross administrative boundaries?
<i>Relevant NPPF Paragraphs: 109 & 117</i>	<ul style="list-style-type: none"> • Minimise recreational impacts on designated sites, in particular European sites?

⁹ AECOM (2017) Southend-on-Sea Local Plan Integrated Impact Assessment Scoping Report [online] available at: <https://www.southend.gov.uk/info/200128/planning_and_building/807/southend_new_local_plan/2> Accessed Dec 2018

IIA Objectives

Assessment questions

Climate Change

Promote climate change mitigation in Southend-on-Sea Borough.

Relevant SEA Topics:

Climatic factors

Relevant NPPF Paragraphs:
93-108

Will the option/proposal help to:

- Promote the use of sustainable modes of transport, including walking, cycling and public transport?
- Reduce the need to travel?
- Promote use of energy from low carbon sources?
- Reduce energy consumption and increase efficiency?

Support the resilience of Southend-on-Sea Borough to the potential effects of climate change.

Relevant SEA Topics:

Climatic factors & water

Relevant NPPF Paragraphs:
93-108

Will the option/proposal help to:

- Direct development away from areas at risk of all forms of flooding as per the sequential test, taking into account the likely effects of climate change?
- Make development safe where it is necessary within an area of flood risk and without increasing flood risk elsewhere?
- Sustainably manage water run-off, with priority given to SuDS, ensuring that the risk of flooding is not increased and where possible reduced?
- Improve and enhance multifunctional green infrastructure networks in the borough (and beyond) to support adaptation to the potential effects of climate change?
- Support the priorities identified in the Essex and South Suffolk Shoreline Management Plan?

Landscape and Historic Environment

Protect and enhance the significance of the borough's historic environment, heritage assets and their settings.

Relevant SEA Topics:

Cultural heritage including architectural and archaeological heritage

Relevant NPPF Paragraphs:
6-10 & 126-141

Will the option/proposal help to:

- Protect, and where possible, enhance heritage assets and their settings?
- Protect, and where possible, enhance conservation areas?
- Protect, and where possible, enhance the wider historic environment?
- Support access to, interpretation and understanding of the historic environment?

Protect and enhance the character and quality of the borough's landscapes and townscapes.

Relevant SEA Topics:

Landscape

Relevant NPPF Paragraphs:
109-125

Will the option/proposal help to:

- Protect and enhance landscape and townscape character?
- Support the integrity of the borough's conservation areas?

Environmental Quality

Improve air, soil and water quality.

Relevant SEA Topics:

Soil, water and air

Relevant NPPF Paragraphs:
109-125

Will the option/proposal help to:

- Maintain or improve local air quality?
- Promote the remediation of contaminated land?
- Protect and improve the area's chemical & biological water quality?
- Protect groundwater resources?

IIA Objectives

Assessment questions

Land, Soil and Water Resources

Promote the efficient and sustainable use of natural resources.

Relevant SEA Topics:

Water and soil

Relevant NPPF Paragraphs:

47-78

Will the option/proposal:

- Promote the use of previously developed land?
- Avoid the use of land classified as best and most versatile agricultural land?
- Minimise water consumption?
- Reduce the amount of waste produced and move it up the waste hierarchy?
- Encourage recycling of materials and minimise consumption of resources during construction?

Population and Communities

Cater for existing and future residents' needs as well as the needs of different groups in the community.

Relevant SEA Topics:

Population and human health

Relevant NPPF Paragraphs:

47-78

Will the option/proposal help to:

- Meet the identified objectively assessed housing needs for the borough?
- Ensure an appropriate mix of dwelling sizes, types and tenures to meet the needs of all sectors of the community?
- Provide housing in sustainable locations that allow easy access to a range of local services and facilities?
- Promote the development of a range of high quality, accessible community facilities, including specialist services for disabled and older people?

To maintain and enhance community and settlement identity.

Relevant SEA Topics:

Population and human health

Relevant NPPF Paragraphs:

47-78

Will the option/proposal help to:

- Avoid the coalescence of settlements and loss of Green Belt land?
- Provide development in the most deprived areas and stimulate regeneration?
- Can development effectively integrate within the existing settlement pattern?
- Enhance the identity of a community or settlement?

Health and Wellbeing

Improve the health and wellbeing of Southend-on-Sea Borough's residents.

Relevant SEA Topics:

Population and human health

Relevant NPPF Paragraphs:

69-78

Will the option/proposal help to:

- Promote accessibility to a range of leisure, health and community facilities for all age groups?
- Encourage healthy lifestyles and reduce health inequalities?
- Enhance multifunctional green infrastructure networks in the borough?
- Provide and enhance the provision of community access to green infrastructure?
- Improve access to the countryside for recreation?

Equalities, diversity and inclusion

Advance equality of opportunity and foster good relations between people in the borough.

Relevant SEA Topics:

Population & human health

Relevant NPPF Paragraphs:

69 - 78

Will the option/proposal help to:

- Meet the needs of all people in the borough?
- Encourage the integration and interaction of different people/communities?
- Reduce inequalities?
- Remove or minimise disadvantages suffered by people due to their protected characteristics?
- Improve access to housing, employment, training, health and leisure opportunities?

IIA Objectives

Assessment questions

Transport and Movement

Promote sustainable transport use and reduce the need to travel.

Relevant SEA Topics:

Population, human health and material assets

Relevant NPPF Paragraphs:
29-41

Will the option/proposal help to:

- Reduce the need to travel through sustainable patterns of land use and development?
- Encourage modal shift to more sustainable forms of travel?
- Enable transport infrastructure improvements?
- Facilitate working from home and remote working?
- Provide improvements to and/ or reduce congestion on the existing highway network?

Economy

Support a strong, diverse and resilient economy that provides opportunities for all.

Relevant SEA Topics:

Population and human health

Relevant NPPF Paragraphs:
18-22, 42 & 43

Will the option/proposal help to:

- Facilitate the provision of the right type of employment land in the right place?
- Provide employment in the most deprived areas and stimulate regeneration?
- Support the economic vitality and viability of the borough's centres and shopping areas?
- Create opportunities for a variety of businesses and people to flourish in the borough?
- Support the visitor economy?
- Facilitate working from home, remote working and home-based businesses?
- Support the growth of London Southend Airport?
- Enhance educational opportunities?

Part 1: What has plan-making/
IIA involved up to this point?

2. Introduction (to Part 1)

- 2.1 The chapter sets out the work undertaken by the Council to date in the preparation of the Local Plan and the Issues and Options Document.

Background

- 2.2 Southend-on-Sea Borough Council is currently in the process of preparing a new Local Plan for the borough. The new Local Plan will set out the Council's strategic vision, policies and site allocations, as appropriate, and will also identify areas for protection. It will provide the planning framework for Southend to 2038, beyond the current plan period of 2021.
- 2.3 The new Local Plan will update a number of the Council's existing planning policy documents, including the Core Strategy, Development Management Document and Southend Central Area Action Plan (SCAAP). It will not however provide a review or update of the Joint Area Action Plan (JAAP) for London Southend Airport and its Environs (2014), or the Replacement Waste Local Plan (2017), which have separate review mechanisms.
- 2.4 The Council has been developing and preparing a number of technical evidence base documents that will support the preparation of the new Local Plan. The development of the evidence base to support plan preparation is on-going and will include studies on the need for new homes, infrastructure, the economy, and the natural environment.

Developing options

- 2.5 Housing development over the current Southend Core Strategy plan period from 2001 to 2021 has until now predominantly taken place on previously developed land within the existing built up area. This reflects the specific nature of the borough, being constrained to the south and east by the River Thames and North Sea, and to the north and west by Green Belt and other planning safeguarding designations including ancient woodland, designated heritage assets and areas of flood risk.
- 2.6 However, using the new standard methodology for calculating housing need introduced by the Government, and the Strategic Housing Market Assessment (SHMA) for South Essex suggests that significantly more homes will be needed across south Essex.^{10,11} In the case of the Southend Borough, current projections estimate this would equate to approximately a tripling of its annual delivery rates for housing (based on each year between 2001 – 2017), and a significant increase in the delivery rates for the neighbouring administrative areas of Castle Point and Rochford. In order to constitute sustainable development, these homes will also require supporting infrastructure, including new employment opportunities, schools and other public services.
- 2.7 The Council understand that to plan effectively for Southend it will be necessary to look beyond the borough's borders and plan strategically with neighbouring authorities.
- 2.8 The south Essex local authorities¹² together with Essex County Council are therefore working together as part of the Association of South Essex Local Authorities (ASELA) to respond to opportunities and address challenges in the sub-region, through cross-boundary working. This includes the preparation of a Joint Strategic Plan (JSP) for South Essex.
- 2.9 The South Essex Authorities have also commissioned a series of evidence base studies, including a South Essex Strategic Growth Locations Study to report in 2019. Castle Point

¹⁰ Thurrock, Basildon, Castle Point, Rochford, Southend

¹¹ Turley Economics (2017) Addendum to the South Essex Strategic Housing Market Assessment [online] available at: <http://www.tgessex.co.uk/downloads/Addendum_to_the_South_Essex_SHMA_May_17.pdf> Accessed Dec 2018

¹² Thurrock, Brentwood, Basildon, Castle Point, Southend and Rochford.

Borough, Rochford District and Southend Councils have prepared a complimentary South East Essex Strategic Growth Locations Assessment (Jan 2019).¹³

- 2.10 Informed by the adopted and emerging policy documents and evidence base, including the SHMA (2017) and SA Scoping Report (October 2017), the Issues and Options Report has been divided into five main topics (sections). Within these sections twelve key issues have been identified (**Table 2.1**). It is proposed that these will form the basis for the chapters of the new Local Plan.

Table 2.1 Southend-on-Sea Issues and Options Report key issues

Section 1 - A Vision for Change	
Issue 1	Our Vision & Strategy for the Future
Section 2 - Planning for Growth and Change	
Issue 2	Housing Including New Housing, Conversions, Affordable Housing, Self-Build
Issue 3	Securing a Thriving Local Economy
Issue 4	Promoting Southend as a Major Resort
Issue 5	Providing for Vibrant and Attractive Town Centres
Issue 6	Providing for a Sustainable Transport System
Section 3 - Creating Good Quality and Healthy Places	
Issue 7	Facilitating Good Design, Healthy Living and Built Heritage
Issue 8	Providing Community Services and Infrastructure
Issue 9	Enhancing our Natural Environment
Issue 10	Planning for Climate Change
Section 4 - Southend's Neighbourhoods	
Issue 11	Southend's Neighbourhoods
Section 5 - Deliverability & Implementation	
Issue 12	Ensuring that the New Local Plan is Delivered

- 2.11 The key issues have been taken from the NPPF 2018, although nevertheless setting out the key local challenges that need to be addressed through the new Local Plan. Informed by the currently adopted policy documents and emerging evidence base, the Council has identified a range of probing questions and options to address the key issues and meet future needs of the borough.

¹³ Castle Point Borough Council, Rochford District Council, and Southend-on-Sea Borough Council (2018) South East Essex Strategic Growth Locations Assessment Accessed Dec 2018

Part 2: What are the IIA findings
at this current stage?

3. Introduction (to Part 2)

Methodology

- 3.1 The Issues and Options Document sets out the main borough-wide challenges and alternative options for addressing spatial planning issues. The Issues and Options Document provides an early opportunity for stakeholders to comment on these options and suggest any other choices open to the Council. It is important to note that, at this stage, no decisions have been made in terms of a preferred approach. In some instances, options may not be mutually exclusive. This means that an individual option is unlikely to be progressed alone; it is more likely that a combination of options would be taken forward by the Council to address the issue in question.
- 3.2 The approach and method for the IIA at this stage reflects the early stage of plan-making and high-level nature of the Issues and Options Document. An appraisal narrative has been produced to identify and evaluate the 'likely significant effects' of the options with respect to the baseline drawing on the sustainability topics and objectives identified through scoping (see Chapter 2, above) as a methodological framework. To reiterate, the IIA topics are:
- Biodiversity;
 - Climate Change;
 - Landscape and Historic Environment;
 - Environmental Quality;
 - Land, Soil and Water Resources;
 - Population and Communities;
 - Health and Wellbeing;
 - Equalities, Diversity and Inclusion;
 - Transport and Movement; and
 - Economy.
- 3.3 The appraisal focuses on key issues and highlights differences between the options where relevant. Where no effects or significant differences between options are identified, then options/ IIA topics may not be specifically referred to within the appraisal narrative. The appraisal narrative is structured according to the five sections and corresponding twelve issues set out in Sections 2 to 5 of the Issues and Options Document.
- 3.4 Every effort is made to predict effects accurately; however, this is inherently challenging given the early stage in plan-making and high-level nature of the options under consideration. Given uncertainties there is a need to make assumptions, e.g. in relation to the way in which the plan might be implemented and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim to strike a balance between comprehensiveness and conciseness/ accessibility) where necessary. In many instances, given reasonable assumptions, it is not possible to predict 'significant effects' or any significant differences between the options, but it is nonetheless possible and helpful to comment on merits (or otherwise) of the options in more general terms.

Appraisal of the options

Section 1: A Vision for Change

Issue 1: Our Vision & Strategy for the Future

How should Southend develop in the future in seeking to deliver 18,000 – 24,000 new homes and 10,000 – 12,000 new jobs?

Option 1 – All development within existing built up areas of Southend

Option 2 – Most development within existing built up area, focussed in specific locations such as the town centre, Airport and main passenger transport corridors with some development on the edge

Option 3 – Option 2 + working with neighbouring authorities to develop a comprehensive new settlement across Borough boundaries (strategic scale development)

- 3.5 Focusing new homes and employment within the existing built up area (Option 1) would likely contribute positively towards maintaining and enhancing the vitality and vibrancy of existing communities; although it may place significant burden on existing infrastructure. Option 1 would likely support the regeneration of Southend (the Southend Central Area Action Plan (SCAAP) (2018) being a main driver of this), bringing back into use empty homes and underused land and to assist Southend's rejuvenation.¹⁴ However, it is recognised that there would likely be limited opportunity within Option 1 to provide new services and facilities to support new residents, and that this option might see the loss of employment land to housing given the limited land available. This could continue the large number of job losses experienced in earlier years of the Plan period throughout the borough.¹⁵ In this context, it is also anticipated that there might be a reliance on high density development to deliver a sufficient level of housing which might in turn have an adverse effect on the quality of life of residents; leading to long term negative effects in relation to the Population and Communities, Health and Wellbeing, and Equalities, Diversity and Inclusion IIA themes.
- 3.6 Option 3, and to a lesser extent, Option 2 has the potential to provide more affordable housing, and a range of housing to meet local needs, which is identified as a key issue for the borough and should be a priority for all options. New housing development should therefore be encouraged to provide a mix of housing types and sizes, including affordable housing; however care will need to be taken to ensure there is a balanced housing offer, taking into account the existing tenure mixes of particular areas.
- 3.7 It is considered that providing a level of growth outside of the existing urban areas on the settlement edges (Option 2) will deliver larger-scale development which may include new infrastructure, while also protecting existing employment sites from redevelopment. Options 1 and 2 both seek to continue to focus employment in existing town centres, business estates and at London Southend Airport which is located to the north of the borough. Dependant on the location of new development, under Option 2, residents may be reliant on the private vehicle to access employment; however, it is noted that the rail links, specifically within the borough, to London, and the airport, are excellent.

¹⁴ Southend-on-Sea Borough Council (2016) Southend Centre Area Action Plan [online] available at: <http://www.southend.gov.uk/info/200420/development_plan_documents/391/southend_central_area_action_plan_scaap/4> Accessed Dec 2018

¹⁵ Southend-on-Sea Borough Council (2017) Economic Growth Strategy [online] available at: <https://www.southend.gov.uk/download/downloads/id/2519/economic_development_and_tourism_strategy_refresh_2010.pdf> Accessed Dec 2018

- 3.8 Option 3 may also lead to adverse effects on the existing road network, depending on the exact location of the new settlement. In this context, it is recognised by the Essex Transport Strategy (2011) and the Southend-on-Sea Local Transport Plan 3 (2015) that much of the inter-urban network in the sub-region is at or near capacity with particular problems for the A127 and A13 providing important links between the Thames Gateway centres and London. All three options therefore have the potential to exacerbate issues on the transport network in this respect, given the level of growth proposed through all options.^{16,17}
- 3.9 The delivery of a New Garden Community (Option 3) will however have a greater chance of ensuring the critical mass of employment and services to ensure communities thrive.¹⁸ In this context, the Garden Community approach would provide a level of self-containment, which might limit the anticipated increase in commuters along the A127 corridor. This is unlikely in the early years of the settlement's development when the number of homes built is likely to be too small to sustain a significant level of employment; however in the longer-term this will reduce adverse effects given the existing capacity constraints (Infrastructure Delivery Plan, 2015).¹⁹ It is also considered that residents will utilise the existing public transport network; however, again this is uncertain and the extent to which they do will be partly dependent on the exact location of the new settlement. Given the strategic-scale of development, it is also anticipated that Option 3 may include improvements to the road network, including junction improvements and extended capacity for sustainable transport options, which would likely benefit existing communities as well as new. This may encourage sustainable transport uptake; and help to minimise adverse effects on the wider road network.
- 3.10 Garden Communities are envisaged as reasonably self-contained entities, and not extensions to existing towns or villages, so creating a whole new community within the borough. The new settlement would likely include high quality public spaces, green infrastructure and good quality design; which could help promote community wellbeing. This could lead to long-term positive effects in terms of the Health and Wellbeing and the Equalities, Diversity and Inclusion IIA themes.
- 3.11 All options have the potential to have a negative effect on the landscape and historic environment; however, the significance is dependent on the precise location of development and the mitigation provided. It is considered that Option 3 will have a significant effect on the local landscape character wherever it is located by permanently altering the rural and historic landscape. However, Option 3 may also lead to positive effects through protecting the local townscape and character of existing areas, avoiding adverse impacts on the skyline and views anticipated through Option 1 as a result of concentrated growth and potentially higher buildings in the urban area. In addition to maintaining Southend's existing character, Option 3 provides an opportunity to provide new valued landscapes through the delivery of Green Infrastructure and open space. The potential for positive effects in this respect are more limited in terms of Options 1 and 2 given the smaller scale development anticipated.
- 3.12 The focus of growth within the existing urban areas (Option 1) is likely to have a more limited adverse effect on environmental constraints due to concentrating growth in urban built-up locations around the existing main settlements. It is noted that the majority of the existing built up areas of Southend are distant from internationally and nationally designated sites, and that existing parks, woodland and the coastline will be protected. The more dispersed approach proposed under Option 2 is likely to have effect on biodiversity across a wider area of the borough compared to the other options and could also make the delivery of mitigation as well as enhancements more difficult. Adverse effects may also arise due to possible loss of/damage to designated sites and BAP priority habitats. The effect on biodiversity for Option 3 is unknown as this will be dependent on the location of the new settlement. However, it is

¹⁶ Essex County Council (2011) Essex Transport Strategy [online] available at: https://www.essexhighways.org/uploads/files/essex_ttp.pdf > Accessed Dec 2018

¹⁷ Southend Local Transport Plan 3 Strategy Document 2011 – 2026 [online] available at: https://www.southend.gov.uk/downloads/file/3491/local_transport_plan_3_-_strategy_document_2012-2026_-_revised_january_2015 > Accessed Dec 2018

¹⁸ Castle Point Borough Council, Rochford District Council, and Southend-on-Sea Borough Council (2018) South East Essex Strategic Growth Locations Assessment

¹⁹ Southend-on-Sea Borough Council (2015) Southend Infrastructure Delivery Plan [online] available at: http://www.southend.gov.uk/downloads/file/3412/southend_infrastructure_delivery_plan_%E2%80%93_february_2015 > Accessed Dec 2018

recognised that the delivery of strategic scale development would likely deliver strategic scale mitigation, including opportunities for delivering biodiversity net gain. Ultimately, in relation to all options, the nature and significance of effects on biodiversity are dependent on the precise location of development.

- 3.13 Option 1 is anticipated to protect greenfield, Green Belt and best and most versatile agricultural land leading to long term positive effects in relation to the Environmental Quality, and Health and Wellbeing IIA themes; maintaining the borough's green infrastructure network. However, as discussed above, it is recognised that increased densification in the urban area could adversely affect quality of life. It is expected that Option 2 will lead to minor negative effects in this respect, for example, through the potential delivery of urban extensions on greenfield sites on the settlements' urban edges. Option 3, however, has the potential to lead to significant negative effects given the likely significant loss of Green Belt, greenfield, and high quality agricultural land. However, it is noted that the nature and significance of effects are unknown and will be dependent on the location of the new settlement.
- 3.14 In terms of climate change, Option 3 offers the greatest potential to incorporate significant low carbon or renewable energy schemes within new development. Option 2 holds some level of potential given the larger-scale developments likely to be proposed; however, this potential is anticipated to be greater for the strategic-scale development under Option 3 compared to the other options, in particular Option 1.
- 3.15 It is recognised that early surveys (completed as part of the preparation of the Housing and Economic Land Availability Assessment (HELAA)) indicate that Southend will not be able to continue to meet all of its housing need within its existing urban area (Option 1) or on land at the edge of the existing built up area of Southend (Option 2).²⁰ As such, the delivery of strategic scale²¹ development (such as a new Garden Community) through Option 3 would appear to be required in order to meet identified needs. However, given Southend's tightly drawn administrative boundary, any strategic scale development will likely have cross border implications with neighbouring authorities, such as Castle Point and Rochford. This is currently being explored through the emerging South Essex Strategic Growth Locations Assessment and the South Essex Joint Strategic Plan (JSP). Despite this, it will be necessary for the on-going IIA process to explore and refine alternative spatial strategies for delivering identified housing needs. This is likely to include increased densities on sites within the existing built up area as well as urban extensions in the north of the borough.
- 3.16 The delivery of Option 3 will likely provide significant long-term positive effects on the Population and Communities, Equalities, Diversity and Inclusion, and Employment IIA themes, through ensuring that new residents have access to good homes, services, and employment.

²⁰ Castle Point Borough Council, Rochford District Council, and Southend-on-Sea Borough Council (2018) South East Essex Strategic Growth Locations Assessment

²¹ Strategic scale has been broadly defined as being large enough to sustain supporting infrastructure such as local schools, shops and other services, as well as some employment generating development and would comprise a minimum of 6,000 to 8,000 dwellings.

Section 2: Planning for Growth and Change

Issue 2: Housing including new housing, conversions, affordable housing, self-build

2. How best do you think we should provide for our future housing needs?

2.1 Intensify housing development by:

- a) allowing an increase of densities across the existing built up area? Or
- b) directing higher density housing to specific locations, such as town centre, near train stations and prime bus routes (e.g. London Road, Southchurch Road, Victoria Avenue, Sutton Road)?

2.2 Allow redevelopment of some of the poorer quality industrial areas and/ or allow some sites currently zoned for employment use to be developed for housing? What sites do you think should be identified?

2.3 Allow housing development on land not currently built on, such as agricultural land, open space (excluding parks and coastline), and land at Fossetts Farm? What sites do you think should be identified?

2.4 Secure a proportion of affordable/ special needs housing on development sites. Do you think we should retain the current policy, seek a higher proportion of affordable housing or provide for a different policy approach/ solution?

2.5 How might the local plan be more responsive to the needs of younger people, older people and custom/ self-builders?

2.6 In terms of the layout and design of housing should we go beyond mandatory building regulations to ensure new homes are highly accessible and adaptable? In what circumstances should this be applied? Should a proportion of new housing on major development sites (10 homes or more) be built to accommodate wheelchair user needs? If so what proportion should this be?

- 3.17 The majority of housing need within the South East Essex Housing Market Area is being driven by population growth within the urban extent of Southend, being the single largest centre within the area.²² Southend has experienced worsening conditions in terms of affordability of housing and other factors when compared to the national average, with higher rates of overcrowding, enforced house sharing, homelessness, house price and private rent rises and low local wages. To address this, and to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay (NPPF, 2018).
- 3.18 Options 2.1 - 2.3 consider the location of housing; all of which to some extent are supported through the Housing Strategy (2011).²³ In this context, it is recognised that, given land is in short supply in Southend, the design and density of new developments should be carefully considered. This is identified through Option 2.6 and would ensure land is used efficiently and that development is sustainable; i.e. with good access to services, facilities and wider infrastructure. The Local Plan should reflect this, providing a strategy for meeting the needs for different types of housing across the borough throughout the plan period.
- 3.19 The Local Plan should build upon the Housing Strategy (2011), which highlights that a good mix of housing types and sizes is important in creating a basis for a balanced community. Equally, when well designed and built in the right location, a more intensive development, such as proposed under Option 2.1, can enhance the character and quality of an area. The Housing Strategy (2011) further supports the redevelopment of redundant areas to create new

²² Castle Point Borough Council, Rochford District Council, and Southend-on-Sea Borough Council (2018) South East Essex Strategic Growth Locations Assessment

²³ Southend-on-Sea (2011) Housing Strategy [online] available at: <https://www.southend.gov.uk/downloads/file/443/housing_strategy_2011-21pdf> accessed Dec 2018

- affordable housing, which is considered through Option 2.2.²⁴ This Option would build upon the recent resurgence and growth experienced within Southend, delivering regeneration in accordance with the SCAAP (2018) vision and objectives. This will contribute positively towards creating vibrant, diverse communities and addressing the pressure on the housing sector in Southend.
- 3.20 Allowing housing development on land not currently built on, as proposed through Option 2.3, would also contribute positively towards delivering housing and meeting local need, for example, through utilising Fossetts Farm on the northern edge of the borough. However, it is recognised that this approach would result in loss of natural resources such as agricultural land and open space. This would be contrary to the NPPF (2018) which requires planning decisions to recognise the economic and other benefits of the best and most versatile agricultural land, contributing to the enhancement of the natural environment. In this context, Plans should allocate land with the least environmental or amenity value, and take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure. It is therefore considered that Options 2.1 - 2.3 are not mutually exclusive, and that a hybrid of these options would likely best ensure the borough's identified housing needs are met, while moderating any adverse effects on the environment and landscape.
- 3.21 Options 2.4 and 2.5 relate to meeting the needs of all groups of people, as prioritised through the Housing Strategy (2011), and higher-level policy (namely the NPPF (2018), and the Southend Core Strategy (2007)). It is therefore considered that the Local Plan should include policies that ensure the delivery of quality affordable homes; that facilitate the improvement of the existing stock; and that ensure the needs of vulnerable tenants (of all ages, children and older persons) are met. This will likely lead to significant long-term positive effects in terms of the Population and Community, and Equalities, Diversity and Inclusion IIA themes.
- 3.22 The Issues and Options Document (2018) recognises that more needs to be done to address affordability issues in the borough. In this context, the Core Strategy (2007) identifies that for larger schemes (50+ dwellings) 30% of the housing proposed is required to be affordable, whilst for smaller sites of between 10 and 49 dwellings the requirement is 20%. It is considered that delivering a higher proportion of affordable housing than identified within the Core Strategy (2007) would lead to positive effects in terms of meeting local housing needs. In accordance with the NPPF (2018), with a view to creating 'sustainable, inclusive and mixed communities', authorities should ensure provision of affordable housing onsite or externally where robustly justified.
- 3.23 Sustainable, inclusive and mixed communities will be further supported through Option 2.5, meeting the needs of younger and older people and contributing to mixed and inclusive communities. This option, amongst others (namely Option 2.6) will contribute positively towards ensuring that all residents can live healthy and active lives within existing communities. As highlighted above, individually the options are unlikely to be able to address this key issue and meet needs. Options 2.1 - 2.6 are not mutually exclusive and therefore a hybrid approach should be taken forward to ensure that the needs of all residents are met, with a long-term significant positive effect for a number of IIA themes.

²⁴ Southend-on-Sea (2011) Housing Strategy [online] available at:
<https://www.southend.gov.uk/downloads/file/443/housing_strategy_2011-21pdf> accessed Dec 2018

Issue 3: Securing a Thriving Local Economy

3. How best do you think we can retain and promote employment in Southend?

3.1 Should we focus new jobs to the town centre, London Southend Airport and associated Business Park and the northern Southend corridor, including the Temple Farm and Stock Road?

3.2 Should we concentrate on promoting digital, cultural and creative industries; healthcare technology; advanced manufacturing and engineering; and tourism sectors?

3.3 Should we continue to focus new office development in the town centre?

3.4 Should we continue to support improvement and re-use of existing allocated employment sites that are suited for continued employment use?

3.5 Should we allow redevelopment of the poorest quality employment sites for other uses such as housing?

3.6 How can we best meet the needs of Small and Medium Sized Enterprises and the need for move-on accommodation as small firms grow?

- 3.24 The borough has a higher unemployment level compared to the regional and national levels.²⁵ The Local Plan will therefore be instrumental in realising future economic opportunities (as identified through Options 3.1 - 3.6) ensuring that the trend of higher unemployment does not continue, and that levels of deprivation and poverty are reduced. In this context, the South Essex Development Needs Assessment (EDNA, 2018) sets the framework for future economic growth and notes that the economic opportunities for South Essex are considerable.²⁶
- 3.25 The EDNA identifies 'growth clusters' as having the potential to deliver future growth in Southend. These align within Option 3.1 and are the Town Centre, London Southend Airport and Northern Southend along the A127 corridor. Option 3.2 further supports the conclusions of the ENDA (2018), recognising that the digital, cultural and creative industries; healthcare technology; advanced manufacturing and engineering; and tourism sectors should be the focus of growth. This is reiterated through the Southend Economic Growth Strategy (2017) which identifies business and strategic partnerships as a key priority for economic development within the borough. In this context, Rochford District Council and Southend Borough Council have prepared the London Southend Airport Joint Area Action Plan (JAAP) (2014) which sets out the projected growth of the airport and its role as a provider for direct employment as well as enhanced opportunities for wider aviation related and business employment.²⁷ The Local Plan policy framework should contribute positively towards facilitating a strategic approach to economic growth, in accordance with the Core Strategy (2007) and the EDNA (2018). As highlighted through the NPPF (2018) planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. This will lead to long term positive effects in terms of the Economy, and Equalities, Inclusion and Diversity IIA themes.
- 3.26 Options 3.3 and 3.4 also support employment and economic growth in the borough; maintaining the functionality of the town centre and existing employment sites. This reiterates the objectives of the SCAAP (2017), which promotes the utilisation of existing employment sites, predominantly for business use. This will support the economic vitality and viability of the borough's centres.
- 3.27 Local Plan policies should also place a focus on the provision of strong infrastructure connections and continued adequate investment into road maintenance and the public transport network to support economic development and employment activities within Southend, and also across South Essex. To this effect, it is recognised that the Council is

²⁵ AECOM (2017) Southend on Sea Integrated Impact Assessment Scoping Report [online] available at: <https://www.southend.gov.uk/info/200128/planning_and_building/807/southend_new_local_plan/2> accessed Dec 2018

²⁶ GVA (2017) South Essex Economic Development Needs Assessment [online] available at: <<https://www.rochford.gov.uk/sites/default/files/SouthEssexEDNAFinalReport20171211.pdf>> accessed Dec 2018

²⁷ Southend on Sea Economic Growth Strategy (2017) [online] available at: <<https://democracy.southend.gov.uk/documents/s11297/23%20-%20Appendix%201%20to%20Growth%20Strategy%20Report.pdf>> accessed Dec 2018

working together with neighbouring authorities in South Essex and with Essex County Council as part of the Association of South Essex Local Authorities (ASELA) to respond to opportunities and address challenges in the sub-region, through cross-boundary working. This includes the preparation of a Joint Strategic Plan (JSP) for South Essex.²⁸

- 3.28 Once again it is considered that Options 3.1 - 3.5 are not mutually exclusive and should be considered in-combination to fully meet the borough's needs and aspirations; supporting new and existing employment opportunities.
- 3.29 It is also recommended that Local Plan policies provide support and investment for education, skills and training to ensure the longevity of the high-skilled sectors currently being expanded. This will help boost the qualifications and skills levels of local people and reduce levels of unemployment.

Issue 4: Promoting Southend as a Major Tourism Resort

4. How best do you think we can enhance the visitor offer in Southend to make it England's leading coastal tourism destination?

4.1 Allocate and promote new sites for additional tourism/leisure developments in the central seafront area or elsewhere in the Borough. Where do you think these should be focussed?

4.2 Promote further hotel and tourist accommodation. Should this continue to be directed to areas in the town centre, seafront and airport or should other areas be promoted?

4.3 Promote the second phase of City Beach and enhanced public realm areas. Should priority for City Beach be given to the areas east of the Pier adjacent the Kursaal or west of the Pier?

4.4 Improve accessibility to the central seafront areas for all users. How best do you think this could be achieved?

4.5 Seek further enhanced links between the central seafront and town centre to improve services and facilities. How best do you think this could be achieved?

4.6 Continue to safeguard Key Visitor Car Parking in line with the provisions of the Southend Central Area Action Plan?

- 3.30 Destination Southend (2017) provides a tourism strategy and destination plan for the borough until 2027; recognising the key role that tourism has played and will continue to play in future years in relation to the economic growth of the area.²⁹ Options 4.1 - 4.6 all contribute towards delivering Southend's ambition of becoming England's leading coastal tourism destination; with Options 4.1 - 4.3 promoting new and existing businesses, developing the visitor economy for the whole borough to benefit from.
- 3.31 Options 4.1 - 4.6 all seek to improve accessibility to the tourism offer, recognising that improved access provides a better experience, which will help to encourage and increase visitor numbers. In this respect, improvements to car parking, public realm, sustainable transport links, accommodation, and the iconic seafront itself will deliver multiple benefits to the borough and the overall tourism industry. It is however recognised that these options are not mutually exclusive and would likely require delivery in-combination to meet the ambitions set out within Destination Southend (2017). This is recognised through the joint vision proposed; working with broad participation from multiple partners including the Southend Tourism Partnership and The Leigh Coastal Community Team.

²⁸ Castle Point Borough Council, Rochford District Council, and Southend-on-Sea Borough Council (2018) South East Essex Strategic Growth Locations Assessment

²⁹ Southend Tourism Partnership (2017) Destination Southend on Sea – A Tourism Strategy and destination plan for the Borough of Southend [online] available at: <https://www.southend.gov.uk/downloads/file/5394/destination_southend> accessed Dec 2018

- 3.32 It is also proposed that delivery is phased to ensure growth is sustainable, minimising any adverse effects on the surrounding environment. The NPPF (2018) states that planning policies and decisions should enable “*sustainable rural tourism and leisure developments which respect the character of the countryside*”. As such, the Local Plan should consider the trade-offs in terms of the growth of the tourism economy and any associated increased pressure on, for example, designated biodiversity sites, priority habitats and species.
- 3.33 In this context, it is recognised that tourism has the potential to cause damage to the environment through increased footfall, disturbance, littering, and pollution. As such, Local Plan policies should ensure increased investment in the tourism industry with respect to the environment. Specifically, designated sites should be protected and where possible enhanced, through sensitive management and appropriate location of development (i.e. taking into consideration potential transport and accessibility constraints, including avoiding locations with existing air quality issues). The delivery of Local Plan policies in this respect will likely contribute towards the sustainable economic growth of the borough. This is anticipated to lead to long term significant positive effects in relation to the Economy, Equalities, Diversity and Inclusion, and Health and Wellbeing IIA themes.

Issue 5: Providing for Vibrant and Attractive Town Centres

5. How best can we ensure that our town centres are successful, vibrant and attractive places in the face of changing retail demands?

5.1 Should Southend Town Centre remain the first preference for all forms of retail development and for other town centre uses attracting large numbers of people, followed by the district centres of Leigh and Westcliff?

5.2 Review the role and function of Southend town centre to provide for a more flexible approach to development schemes? For example:

- a) do you think a greater mix of uses should be allowed such as retail, cafes and bars and other leisure uses, education facilities, offices and residential? This would require the current primary and secondary shopping designations to be radically reviewed; or
- b) do you think the town centre should be refocused into specific themes, for example establishing leisure, education and retail zones? If so, which parts of the centre do you think this should be applied to?

5.3 Do you think the current town centre boundary (see SCAAP or Retail and Town Centres Topic Paper) should be amended? Should we allow more residential uses on the periphery?

5.4 Do you think the Westcliff and Leigh shopping centres should continue in their current formats or do you think there should be changes?

5.5 Encourage and promote further enhancements to the public realm, such as improved paving, seating, tree planting and landscaping. What do you think the priorities should be and where?

- 3.34 The main shopping centres of the borough are the town centre and two district centres at Westcliff and Leigh. These are complemented by a number of local centres, retail parks, and stand-alone large supermarket facilities. In accordance with the NPPF (2018) planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. This is reflected through Options 5.1 - 5.5 which provide alternative strategies to the development of the borough's centres, capitalising upon the flexible approach adopted by the SCAAP (2018).³⁰

³⁰ Southend-on-Sea Borough Council (2016) Southend Centre Area Action Plan [online] available at: http://www.southend.gov.uk/info/200420/development_plan_documents/391/southend_central_area_action_plan_scaap/4
Accessed Dec 2018

- 3.35 Local Plan policies should align with the SCAAP's (2018) Central Area Strategy and Criteria Based Policies; recognising the role of the SCAAP as an important catalyst and driver for inward investment and for the delivery of the remaining proportion of planned regeneration and growth in the Southend Central Area to meet or exceed Core Strategy (2004) targets up to 2021.
- 3.36 The Local Plan should utilise opportunities to deliver economic growth within the borough's centres, reflecting the recommendations within the South Essex Economic Development Needs Assessment (EDNA) 2017 and the key findings of the South Essex Retail Study (2017).^{31,32} In this context, maintaining the two district centres (Option 5.4) will further support local communities, providing for local shopping and leisure needs, and supporting the overall local economy. In line with Option 5.5, the public realm should also be enhanced where possible, to increase the attractiveness of the centres for residents, investors and visitors alike. This is likely to lead to long term positive effects in terms of the Economy, Health and Wellbeing, Population and Community, and Equalities, Inclusion and Diversity IIA themes.
- 3.37 The options set out are not 'either/or' and instead a combined approach should be taken which addresses the needs of Southend as the borough's main centre; and the supporting centres, seeking opportunities to maintain and enhance their vitality.

Issue 6: Providing for a sustainable transport system

6. How best do you think we can improve the transport system serving Southend

- 6.1 Seek to make further improvements to the A127. What do you think these should be?
- 6.2 What do you think should be done to create improved access if a new settlement is built north of Fossetts Farm, Garon Park and Bournes Green Chase (see figure 9)?
- 6.3 How should we provide for enhanced sustainable transport provision in the town in the form of rail, bus, park and ride, cycling and pedestrian facilities? What do you think these should be and what should be prioritised?
- 6.4 Provide for park and ride facilities to serve Southend. Where do you think these should be and in what format?
- 6.5 How do you think technologies such as the internet, electric and driverless cars will affect how we travel by 2038?

- 3.38 Southend's transport network is heavily utilised. The Essex Transport Plan (2011) highlights that within the inter-urban road network, particularly problematic areas are the strategic routes of the A127 and the A13 which provide important links between the Thames Gateway centres and London.³³ Congestion in the borough is mainly attributed to local journeys, school runs and commuting to London. Options 6.1 - 6.5 therefore propose actions that would improve congestion and manage the existing high level of out-commuting to employment locations outside the borough, most notably London. Furthermore, the Options address localised traffic issues, supporting schemes such as Park and Ride to reduce pressure on the road network.
- 3.39 The Council may also wish to consider future modelling of the road network. This would provide up-to-date evidence to further inform the development of options to alleviate local transport issues; particularly surrounding the A127 and A13 strategic routes. In this context, the Southend Local Transport Plan 3 (LTP3) (2015), the SCAAP (2018) and the A127 Corridor

³¹ South Essex Economic Development Needs Assessment (2017) [online] available at: <https://www.basildon.gov.uk/media/7967/South-Essex-Economic-Development-Needs-Assessment-Nov-2017/pdf/South_Essex_Economic_Development_Needs_Assessment_-_Nov_2017.pdf?m=636535950936030000> Accessed Dec 2018

³² Peter Brett Associates (2017) South Essex Retail Study [online] available at: <<https://www.rochford.gov.uk/sites/default/files/SouthEssexRetailStudyVolume%201.pdf>> Accessed Dec 2018

³³ Essex County Council (2011) Essex Transport Strategy [online] available at: <https://www.essexhighways.org/uploads/files/essex_ltp.pdf> Accessed Dec 2018

Strategy (2014) seek to build on the progress in reducing congestion and ensuring that future development proposals in terms of housing and employment are fully sustainable.^{34,35,36}

- 3.40 In line with the NPPF (2018) transport issues should be considered from the earliest stages of plan-making so that potential impacts of development on transport networks can be addressed. As such, it is considered that the delivery of improved sustainable transport modes to address the borough's existing and future congestion issues should be a focus and overall commitment of the Local Plan; supported by the LTP3 (2015) (among other higher-level policy documents). Notably, the LTP3 recognises that the delivery of an improved bus network serving the A127, Southend Airport and Shoeburyness is extremely important in providing a reliable and modern service to areas of the town currently lacking in efficient transport links. The delivery of improved sustainable transport infrastructure in the borough will contribute positively towards encouraging modal shift and reduce reliance on the private vehicle.
- 3.41 A potential advantage of looking to accommodate strategic scale development in a comprehensively planned way, such as by a new Garden Community, is that there is a better chance of securing the necessary transport infrastructure. However, the level of transport infrastructure required for a new settlement would be largely dependent on its location and the existing infrastructure available. This is likely to be a key consideration if the new settlement approach is adopted through the Local Plan and the South Essex Joint Strategic Plan.
- 3.42 Options 6.1 - 6.5 are not mutually exclusive and the Council should consider a hybrid approach that includes both strategic and more localised transport improvements to support the aspirations of the Plan. For example, Option 6.4 alone would not sufficiently address the scale of growth and potential resulting pressure on the transport network that is predicted. As such, the Council should support an option which facilitates a variety of approaches to sustainable travel. A key focus should be on improving access to sustainable transport modes for all residents. This would likely deliver significant long term positive effects for the Transport and Movement IIA theme, and indirect positive effects for Climate Change, Population and Community, Equalities, Diversity and Inclusion, and Health and Wellbeing IIA themes.

³⁴ Southend-on-Sea Borough Council (2015) Southend-on-Sea Borough Council Local Transport Plan (LTP3) Implementation Plan [online] available at:

<https://www.southend.gov.uk/info/200242/transport_policies_and_traffic_regulation_orders/343/local_transport_plans>

Accessed Dec 2018

³⁵ Southend-on-Sea Borough Council (2016) Southend Centre Area Action Plan [online] available at:

<http://www.southend.gov.uk/info/200420/development_plan_documents/391/southend_central_area_action_plan_scaap/4>

Accessed Dec 2018

³⁶ Essex County Council and Southend on Sea Borough Council (2014) A127 – Corridor for Growth. An Economic Plan [online] available at: <<https://www.essexhighways.org/uploads/docs/nevendon-a127-corridor-for-growth-paper2.pdf>> Accessed Dec 2018

Section 3: Creating Good Quality and Healthy Places

Issue 7: Facilitating Good Design and Healthy Living and Built Heritage

7. How best do we ensure healthy communities and development is appropriate and of a quality design, whilst ensuring we enhance our built heritage assets?

7.1 Continue to promote improved and new areas of public realm. Do you think priorities should be established as to where this should take place?

7.2 Require high quality landscape design and tree planting in new developments. Do you think priorities should be established as to which areas of the borough should be subject to streetscape upgrading first?

7.3 Should we seek to limit the proliferation of new fast food outlets close to locations where children congregate such as schools, community centres and playgrounds or where there is an over-concentration of existing premises? Are there other ways of tackling this issue?

7.4 Do you believe there are additional areas that should be protected as Conservation Areas?

- 3.43 The Issues and Options Document (2018) highlights the growing importance of good quality design, particularly given the increasing pressure for new housing developments, and possibly development at higher densities within the town centre and other areas of the borough. In this context, and in accordance with the NPPF (2018), the Local Plan should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable.
- 3.44 Capitalising upon Options 7.1 and 7.2, the Local Plan, alongside detailed design guidance, should provide a framework for creating distinctive places, with a consistent and high-quality standard of design. This may include the use of visual tools such as design guides and codes to provide maximum clarity about design expectations at an early stage (NPPF, 2018). This will build positively upon current planning policies, providing further detailed guidance and advice on design as set out in the Southend Design and Townscape Guide (2009) and the Streetscape Manual.³⁷ It is recognised that these documents will be reviewed and updated as part of the Local Plan process to reflect changing circumstances.
- 3.45 Local Plan design policies should be developed with local communities, so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics (as identified through the Southend-on-Sea Joint Strategic Needs Assessment (2017)).³⁸ This will contribute positively towards delivering strong, vibrant and healthy communities and help support healthy living environments. Positive effects in this respect relate to the Landscape and Historic Environment, Population and Communities, Health and Wellbeing, and Equalities, Inclusion and Diversity IIA themes.
- 3.46 In line with the NPPF (2018) Local Plans should set out a positive strategy for the conservation and enjoyment of the historic environment (Option 7.4). Local planning authorities have a statutory duty to preserve and enhance the character and appearance of heritage assets; which are extensive in Southend, including 14 Conservation Areas, three Scheduled Monuments and numerous listed buildings. Notably, the seaside heritage, including the Grade II listed pier is an important component of the tourist economy and plays a crucial role in the identity of the town. Planning policies should therefore ensure that development is sympathetic to these features, the surrounding built environment and setting; in accordance with the Southend Conservation Area Appraisals and Southend Borough Wide Character Study (2011).³⁹ This would provide the necessary protection of the borough's heritage assets, including through ensuring appropriate

³⁷ Southend-on-Sea Borough Council (2009) Design & Townscape Guide [online] available at: <https://www.southend.gov.uk/info/200421/supplementary_planning_documents_spds/393/design_and_townscape_guide_spd_1> Accessed Dec 2018

³⁸ <https://www.southend.gov.uk/downloads/download/420/spd_3_streetscape_manual>

³⁹ Urban Practitioners (2011) Southend Borough Wide Character Study [online] available at: <www.southend.gov.uk/.../id/.../southend_character_study_-_1_introductionpdf.pdf> Accessed Dec 2018

design and layout, leading to positive effects on the Landscape and Historic Environment theme.

- 3.47 Option 7.3 considers how the Local Plan can promote healthier lifestyles by supporting opportunities for communities to access a wide range of healthier food. Positive effects in this respect may also be delivered through improved access to open green space, sports, recreation and other engaging community facilities. This builds upon the broad impact goals of the Health and Wellbeing Strategy Refresh (2015) which include increased physical activity; and increased personal responsibility and participation.⁴⁰ Increased physical activity and engagement with others will likely improve physical and mental health and wellbeing which may promote healthier choices. This will lead to positive effects in terms of the Population and Communities, Health and Wellbeing, and Equalities, Inclusion and Diversity IIA themes.
- 3.48 It is considered that options are not mutually exclusive, and that to facilitate good design, healthy living and built heritage, a combined approach is required. For example, Option 6.3 relates specifically to addressing childhood obesity, whereas Options 6.1 and 6.2 address public realm. As such, the Council should support an option which facilitates a variety of approaches to creating good quality and healthy places.

Issue 8: Providing Community Services and Infrastructure

8. How best can we provide for our future community needs to secure a sustained high quality of life and well-being having regard to future growth?

8.1 Are there any specific issues regarding educational provision that you consider need to be addressed with respect to new development?

8.2 How do you consider that health issues should be addressed in the Local Plan? How can new development encourage healthy lifestyles?

8.3 Should we require open space and play areas as part of new development schemes? Do you think in appropriate cases this could be provided in an off-site location?

8.4 As part of planning approvals should we ensure that all developments deliver quality broadband infrastructure and connectivity?

- 3.49 Southend-on-Sea Borough Council is a member of many partnership groups, working to address strategic matters including strategic social infrastructure; namely education and health provision. In this context, the Southend Health and Wellbeing Board, which is made up of local statutory organisations and health related partners, work in partnership with the objective to improve the health and wellbeing of Southend's residents. A Health and Wellbeing Strategy for the borough has recently been refreshed (2015) and seeks to promote healthy lifestyles through maximising opportunities, promoting active and healthy ageing, and protecting health.⁴¹
- 3.50 To best meet community needs and secure a sustained high quality of life for residents the Local Plan should provide the overarching framework for infrastructure delivery. The IDP (2015) highlights that during 2014-15 there was a need for funded education places for 40% of two-year olds in the borough, and a patient list size capacity deficit of 36,183 and a floorspace and funding deficit of 1,698m² and £3.40m respectively.⁴² It is therefore expected that significant growth in the borough would place substantial pressure on existing health facilities. The Local Plan will therefore need to plan for an increase in primary healthcare facilities (e.g. GP surgeries) to meet projected population growth over the next twenty years. Similarly, new infrastructure to support specialist groups (namely social and community health care provision to meet the needs of a growing older and vulnerable population) will need to be put in place.

⁴⁰ Southend-on-Sea Borough Council (2015) Southend's Health and Wellbeing Strategy Refresh [online] available at: <https://www.southend.gov.uk/downloads/download/385/health_and_wellbeing> Accessed Dec 2018

⁴¹ Ibid.

⁴² Southend-on-Sea Borough Council (2015) Southend Infrastructure Delivery Plan [online] available at: <http://www.southend.gov.uk/downloads/file/3412/southend_infrastructure_delivery_plan_%E2%80%9393_february_2015> Accessed Dec 2018

- 3.51 It is considered that strategic-scale development, i.e. focusing growth at a new settlement (Garden Community), will have a relatively strong chance of delivering the necessary infrastructure improvements to facilitate sustainable development, including education and health provision discussed above. In this context, strategic policies should set out an overall strategy for the pattern, scale and quality of development, delivering sufficient provision through land and financial contributions (NPPF, 2018).
- 3.52 Non-strategic development, i.e. delivering all development within existing built up areas of Southend; and delivering development within existing built up areas with some development on the edge, also has the potential to deliver a level of new/ improved infrastructure. However, these options are less likely to deliver the critical mass to provide a significant level of infrastructure and would likely result in the delivery of small scale infrastructure on sites that are scattered throughout the borough, predominately in and around Southend town centre and the district centres. It is uncertain whether these options would provide sufficient health provision and education opportunities to meet local needs throughout the plan period.
- 3.53 The existing and projected future capacity of broadband connectivity is also essential to the planning and phasing of future development. In accordance with the NPPF (2018) planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. This is proposed through Option 8.4 and will contribute positively towards promoting social-wellbeing and economic growth.
- 3.54 Overall, a combined approach of Options 8.1 - 8.4 is recommended to best provide for future community needs; supporting sustainable communities with sufficient access to services and infrastructure.

Issue 9: Enhancing Our Natural Environment and Heritage

9. How best do we protect and enhance our environment in the face of increasing growth and development pressures?

9.1 Work with other stakeholders, funding bodies and developers to identify opportunities to promote and enhance the natural environment, and incorporate net gains for biodiversity in new development?

9.2 Seek to enhance the borough's network of green infrastructure using developer contributions for the management of green and open spaces and introduction of pocket parks?

9.3 In liaison with adjoining local authorities seek to provide new country park and open parkland facilities (including from developer contributions) as part of strategic development sites, including where they help mitigate pressure on some of the more sensitive coastal habitats?

- 3.55 Southend contains a diverse and rich range of areas important for their biodiversity and nature conservation value, including European designated sites (Benfleet and Southend Marshes SPA and Ramsar site, Essex Estuaries SAC and Foulness SPA and Ramsar site) situated in the estuaries and along the coast. In terms of development pressures on the European designated sites, these will be primarily addressed through the Habitats Regulations Assessment (HRA) process that will be undertaken for the emerging Local Plan. This will identify any aspects of the Plan that would cause an adverse effect on the integrity of European sites either in isolation or in combination with other plans and projects and will advise on appropriate mechanisms for delivering mitigation where such effects are identified.
- 3.56 The key issues of relevance for the Local Plan and IIA include coastal squeeze through further development and increased levels of public access/disturbance to wildlife sites. In line with the NPPF (2018) planning policies and decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. Options 9.1 - 9.3 are all significant in this respect and will contribute positively towards protecting and enhancing natural habitats and maintaining the character of the

- undeveloped coast. This will lead to long term positive effects in terms of the Biodiversity IIA theme.
- 3.57 In terms of opportunities to increase Southend's green infrastructure network, Local Plan policies should be ambitious, considering the level of need identified through the Plan period and the pressure this will place on open spaces in the borough. In this context, it is recognised that Southend is renowned for the quality of its parks and open spaces; however the IDP (2015) suggests that there is a need to improve the provision of, and access to, Accessible Natural Greenspace (ANG) given the borough is the only South Essex authority with below Essex-average provision of 20 hectare site access.⁴³ Initiatives are therefore currently being pursued to maximise the extent of potential benefits to be delivered (i.e. through the Parks and Green Spaces Strategy (2015), the SCAAP (2018), and the emerging Recreational Disturbance Avoidance & Mitigation Strategy).^{44,45} This will lead to positive effects in terms of a number of IIA themes; e.g. Health and Wellbeing and Climate Change.
- 3.58 Priorities of the Parks and Green Spaces Strategy (2015) include providing and maintaining good quality parks and open spaces; and connecting these spaces with well-maintained and attractive street scenes. The delivery of a Garden Community would likely include the greatest level of green infrastructure delivery (Options 9.2 and 9.3), contributing positively towards meeting local needs (as identified through the IDP (2015)) (although there would be greenfield land take associated with any new Garden Community). Developer contributions will likely be greater under this option given its strategic-scale compared to a dispersed development strategy focused around the urban centres and settlement boundaries. Additionally, the Local Plan policies can set standards for the level of green space to be delivered through a Garden Community, ensuring development is delivered in a comprehensively planned way to meet local needs. This should be in accordance with the Development Management Plan (2015) and Essex Design Guide (2018).^{46,47}
- 3.59 Overall, as the options proposed are not mutually exclusive, the delivery of a combination of options 9.1 -9.3 is seen to be the most appropriate approach, ensuring the safeguarding of the environment and opportunities for enhancement where possible. The Local Plan should seek opportunities for biodiversity enhancement and net gain, with particular focus placed on internationally and nationally designated sites. Where possible green infrastructure networks should be improved and enhanced.

⁴³ Southend-on-Sea Borough Council (2015) Southend Infrastructure Delivery Plan [online] available at: http://www.southend.gov.uk/downloads/file/3412/southend_infrastructure_delivery_plan_%E2%80%93_february_2015 Accessed Dec 2018

⁴⁴ Southend-on-Sea Borough Council (2018) Parks and Green Spaces Strategy 2015 – 2020 [online] available at: http://www.southend.gov.uk/download/downloads/id/3854/parks_and_green_spaces_strategy.pdf Accessed Dec 2018

⁴⁵ Southend-on-Sea Borough Council (2016) Southend Centre Area Action Plan [online] available at: http://www.southend.gov.uk/info/200420/development_plan_documents/391/southend_central_area_action_plan_scaap/4 Accessed Dec 2018

⁴⁶ Southend-on-Sea Borough Council (2015) Southend-on-Sea Development Management Document [online] available at: https://www.southend.gov.uk/downloads/file/3737/southend_development_management_document_adopted_version Accessed Dec 2018

⁴⁷ Essex County Council (2018) Essex Design Guide [online] available at: <https://www.essexdesignguide.co.uk/> Accessed Dec 2018

Issue 10: Planning for Climate Change

10. How best do we plan for the future impacts of climate change?

10.1 Should we develop local planning policies for the development of new or renewed sea defences?

10.2 Require mitigation and adaptation measures to deal with the increase in average temperatures and greater rainfall, including tree planting and urban greening?

10.3 Support renewable and low carbon energy schemes, including photovoltaic (PV) panels, biomass plants and electric vehicle charging points?

10.4 Develop a local standard for decentralised energy generation in new development that is more ambitious than national targets?

10.5 Should we balance the need to retain the best and most versatile agricultural land for food security against future needs for housing and local services?

- 3.60 In line with the NPPF (2018) the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. Options 10.1 - 10.5 all contribute positively towards addressing key issues in this respect, recognising that for Southend significant effects are anticipated in terms of sea level rise and the need to ensure that sea defences are sufficient. This is given that climate change is likely to increase sea levels and cause weather to become more variable.⁴⁸ Local Plan policies will therefore be required to minimise vulnerability and improve resilience; ensuring that all new development takes account of the Essex and South Suffolk Shoreline Management Plan 2 (2010) and have regard to the need to manage future flood risk and coastal change.⁴⁹
- 3.61 The NPPF (2018) also states that Local Plans should be supported by Strategic Flood Risk Assessment (SFRA). The Southend SFRA is being updated to inform the emerging new Local Plan.
- 3.62 The Local Plan has an important role to play in helping to increase the use and supply of renewable and low carbon energy and heat; including through identifying opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems (NPPF, 2018). This is promoted through Option 10.4, building upon Southend's Low Carbon Energy and Sustainability Strategy (2015) which sets out a five-year strategy to establish Southend-on-Sea as a 'Low Carbon City'.⁵⁰ The development and implementation of policies that promote energy efficiency and the use of renewable energy in new development schemes will contribute positively towards delivering the targets set out within the Low Carbon Energy and Sustainability Strategy (2015) and reflect international best practice in terms of mitigating against the effects of climate change.⁵¹ This will deliver long term positive effects in terms of the Climate Change IIA theme.
- 3.63 It is recognised that Southend contains areas of high grade agricultural land, located predominantly to the north and north east edges of the borough. In line with the NPPF (2018) local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality. This issue is addressed through Option 10.5, and while it is likely to be inevitable that there will be some loss of agricultural land in meeting identified needs, the Local Plan should seek to minimise the loss of high quality agricultural land where possible.

⁴⁸ AECOM (2017) Southend on Sea Integrated Impact Assessment Scoping Report [online] available at: <https://www.southend.gov.uk/info/200128/planning_and_building/807/southend_new_local_plan/2> Accessed Dec 2018

⁴⁹ The Essex and South Suffolk Shoreline Management Plan (2010) [online] available at:

<<http://www.eacg.org.uk/docs/smp8/essex&southsuffolk%20smp%20final%202.4.pdf>> Accessed Dec 2018

⁵⁰ Southend-on-Sea Borough Council (2015) Low Carbon Energy & Sustainability Strategy 2015-2020 [online] available at: <<https://democracy.southend.gov.uk/Data/Place%20Scrutiny%20Committee/201412011830/Agenda/att24735.pdf>> Accessed Dec 2018

⁵¹ Town and Country Planning Association (2018) Rising to the Climate Crisis: A Guide for Local Authorities on Planning for Climate Change [online] available at: <<https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=fd66dbe5-2b88-4acf-b927-256a82db9abe>> Accessed Dec 2018

- 3.64 Overall, Options 10.1 - 10.5 should be considered in combination, as they all contribute towards planning for the future of the borough and its resilience to climate change.

Section 4: Southend's Neighbourhoods

Issue 11: Southend's Neighbourhoods

11.1 What do you think are the key issues facing the neighbourhoods in the Borough?

11.2 What do think are the possible options available for resolving these issues?

- 3.65 Southend's Neighbourhoods are varied in terms of their environmental, social and economic characteristics. Notably, Southend central area is currently supported by the SCAAP (2018) which provides a planning framework to guide the evolution and regeneration of the town centre, securing its future prosperity as the borough's main retail centre.⁵² In contrast, suburban local centre Eastwood is quiet and suburban in character, while the urban form in Thorpe Bay and Shoeburyness is more fragmented, characterised by the seafront and estuary.
- 3.66 The Local Plan should consider the constraints and opportunities of all the borough's neighbourhoods, delivering a policy framework which maintains and enhances their vitality, and addresses development pressures where they arise. The Local Plan may wish to provide support for Neighbourhood Plans, which can be prepared by either town or parish councils and make up part of the Development Plan for the borough. Neighbourhood Plans can play an important role in identifying the special qualities of each area and explaining how these should be reflected in development (NPPF 2018). Where Neighbourhood Plans are prepared they must be in general conformity with the policies set out in the Local Plan in accordance with the Neighbourhood Planning (General) Regulations 2012 (as amended).

⁵² Southend-on-Sea Borough Council (2016) Southend Centre Area Action Plan [online] available at: http://www.southend.gov.uk/info/200420/development_plan_documents/391/southend_central_area_action_plan_scaap/4
Accessed Dec 2018

Section 5: Deliverability & Implementation

Issue 12: Ensuring that the New Local Plan is Delivered

12. How best do you think the Local Plan can be effectively delivered in the face of limited resources?

12.1 Continue to work in partnership with the private, public and voluntary sector plus neighbouring authorities to secure funding for key infrastructure projects??

12.2 Set out priorities for project delivery. What do think these priorities should be and how should any phasing be applied?

12.3 Increase the Community Infrastructure Levy tariffs to fund future projects?

12.4 Through Garden Communities key principles ensure land value capture and long-term stewardship for the benefit of the community, to provide and coordinate the necessary infrastructure?

- 3.67 It is recognised that the implementation and delivery of the Local Plan is dependent on achieving outputs that provide for the quantitative requirements of the Local Plan, while also ensuring that the wider outcomes satisfy the Local Plan's vision and objectives; contributing to net gains for sustainable development.
- 3.68 In this context, Southend's IDP (2015) provides an update to the infrastructure evidence base and aids the production of the Community Infrastructure Levy (CIL) and CIL Charging Schedule.⁵³ The term 'infrastructure' covers a wide range of services and facilities provided by public and private organisations. CIL can be spent on the provision, improvement, replacement, operation or maintenance of roads and other transport facilities, flood defences, schools and other educational facilities, medical facilities, sporting and recreational facilities, and open spaces.⁵⁴
- 3.69 As referred to under Options 12.1 - 12.4, in order to effectively deliver the Local Plan, contribution will be sought from developers to deliver infrastructure provision (as identified above). These will either be in the form of a CIL payment or as part of Section 106 legal agreement attached to the planning permission. As identified through Option 12.4, it is considered that focusing development at a new settlement (Garden Community) will provide the greatest scope for significant infrastructure delivery given the strategic-scale approach. The delivery of a new settlement would also likely allow for infrastructure delivery to be coordinated and phased, in line with Local Plan policy. This will contribute positively towards delivering sustainable development that meets identified needs throughout the Plan period. Positive effects are therefore anticipated in relation to several IIA themes; for example, Population and Communities.
- 3.70 A combined approach, utilising Options 12.1 - 12.4, is encouraged to ensure effective delivery of the Local Plan.

⁵³ Southend-on-Sea Borough Council (2015) Southend Infrastructure Delivery Plan [online] available at: http://www.southend.gov.uk/downloads/file/3412/southend_infrastructure_delivery_plan_%E2%80%93_february_2015 Accessed Dec 2018

⁵⁴ Section 216(2) of the Planning Act 2008 (as amended)

Developing the Preferred Approach

3.71 At this stage there has been no decision made in terms of a preferred approach. The Council is currently seeking views from key stakeholders and the public on the key issues and broad options set out in the Issues and Options Document (2018). As discussed above, the majority of proposed options are not mutually exclusive, and it is likely that a combination of them will be required to meet the needs of the borough during the life of the Local Plan.

Part 3: What are the next steps?

4. Introduction (to Part 3)

4.1 The aim of this chapter is to explain next steps in the plan-making/ IIA process.

Next steps

- 4.2 This Interim IIA Report will accompany the Issues and Options Document for public consultation in early 2019. Any comments received will be reviewed and then taken into account as part of the iterative plan-making and IIA process. Following the consultation, there will be further consideration of more clearly defined spatial strategy options as well as policies for the delivery and management of growth.
- 4.3 The representations received along with further evidence base work, including further IIA work, will inform the development of a first draft of the Local Plan (Preferred Options), which is scheduled to be published for consultation in the winter 2019/20. An updated Interim IIA Report will accompany the first draft Local Plan for consultation.

