Southend Local Plan Regulation 18 Preferred Approach with Options Consultation Report

October 2026







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Executive Summary

Overall – summary of consultation (Regulation 18, 2025)

- The consultation was held between 24th July and 30th September 2025.
- Approximately 2,000 representations were received.
- The majority of representations were received through the online consultation system (c.74.6%), by email (c.25.1%), plus a small number received by post.
- Representations were received from 445 respondents including: local residents and residents associations, land promoters, developers, neighbouring local authorities, Anglian Water, Essex and Suffolk Water, Environment Agency, Historic England, National Highways, London Southend Airport, Essex County Fire and Rescue, NHS, Essex Police, Defence Infrastructure Organisation, SCC Transport, SCC Public Health, SCC Environmental Health, Network Rail, Sport England, Port of London Authority, among others.
- Most responses were received by residents living in the east of Southend.
- The following table provides an overview of representations received across all sections of the plan (1,981 in total), and all representations excluding Section 3b (relating to the potential option of a new neighbourhood to land north of Southend). When considering responses to all questions (excluding section 3b) there were more responses in support than object.

All Representations (1,981 total)		
Support	Object	Comment
916 (46%)	826 (42%)	239 (12%)
All Representations (excluding Section 3b) (1,329 total)		
Support	Object	Comment
692 (52%)	417 (31%)	220 (17%)

- The table below provides a breakdown of representations received to Section 3b only. This addressed the policy option of a new neighbourhood to land north of Southend (652 responses in total to the six questions within this section of the plan). When considering responses to Section 3b only, there were more objections than support.

Representations on Section 3b (652 total)		
Support	Object	Comment
224 (34%)	409 (63%)	19 (3%)

- The following table provides an overview of responses to Section 3b by individual question to illustrate where responses were received. Q3B.1B asked whether land north of Southend should be **retained as green belt**. The results below therefore also include an overview of responses received to Section 3B **excluding Q3B.1B** to provide further clarity on the balance of responses received, in terms of support/ object.

Question	Total	Support	Object	Comment
3B (ALL Questions)	652	224	409	19
Q3B.1B – retain LNOS as green belt?	194	166	28	0
3B (ALL – Excluding Q3B.1B)	*458*	*58*	*381*	*19*
Q3B.1A – allocate LNOS for mixed use residential?	210	14	186	10
Q3B.2A – Green belt only released in conjunction with adjoining land in Rochford?	69	11	57	1
Q3B.2B – Green belt released regardless of whether adjoining land in Rochford is available?	77	6	70	1
Q3B.3 – Do you support the guiding principles that would apply to LNOS?	68	13	52	3
Q3B.4 – Should other criteria be incorporated into the guiding principles?	34	14	16	4

- In summary, 652 representations were received on 6 questions within Section 3b:
    - Q3b.1a (majority objection to allocating land north of Southend for mixed use residential led development) [210 representations received; 14 support, 186 object, and 10 comments]. Support 13%; Object 83%; Comments 4%
    - Q3b.1b (majority support – for retaining land north of Southend as Green Belt) [194 representations, of which 166 support and 28 object]. Support 85%; Object 15%
    - Q3b.2a (majority of respondents did not agree that Green Belt land north of Southend should only be released in conjunction with adjoining land in Rochford to provide a comprehensive new neighbourhood) [69 representations in total, of which 57 object, 11 support, and one comment].
    - Q3b.2b (majority of respondents did not agree that Green Belt land north of Southend should be released for housing development regardless of whether adjoining land in Rochford District is made available) [77 representations in total, of which 70 object, 6 support, and one comment].
    - Q3b.3 (majority of respondents object to the guiding principles) [68 representations in total, of which 52 object, 13 support and three comments].
    - Q3b.4 (asked whether other criteria should be incorporated into the guiding principles, and overall the response was largely balanced between support and object) [34 representations in total, of which 16 object, 14 support, and four comments].

Overview of representations and how we responded

Chapter 3 Strategy, objectives and infrastructure

You Said

- Support for an infrastructure-led approach;
- Infrastructure should be properly planned for and funded, particularly in relation to any housing development;
- Concerns that infrastructure would not be delivered;
- Strategic objectives should be expanded.

We Did

- Prepared updated evidence including Infrastructure Delivery Plan, Viability Assessment, Housing Needs Assessment, Economic Needs Assessment, Retail and Leisure Study, Water Cycle Study, Strategic Flood Risk Assessment, and Transport Assessment to inform plan preparation;
- Updated strategic objectives, including adding reference to water efficiency, jobs and skills, active travel, and digital infrastructure;
- Expanded and clarified Policy SP3 in relation to infrastructure requirements to include reference to flood risk management, upgrades to the sewer network and wastewater recycling.

Chapter 3 Policy Option 3b – Option of a new neighbourhood to Land North of Southend.

You Said

- Objections to potential impacts on road network, existing infrastructure, water supply, drainage and wastewater treatment;
- Objections to loss of green belt, loss of agricultural land, impacts on wildlife, impact on existing residential areas;
- Support for potential provision of housing, including affordable housing and housing types to provide opportunities for more people to find a home, with reference made to housing shortages locally;
- Support for development if comprehensively planned, providing necessary infrastructure, transport and public open green space.

We Did

- Prepared updated evidence base including Transport Assessment, Green Belt Assessment, Infrastructure Delivery Plan, Housing Needs Assessment, Economic Needs Assessment, urban capacity, playing pitch and built facilities assessment, Strategic Flood Risk Assessment, Water Cycle Study, and Viability Assessment to inform plan preparation;
- Reviewed representations to understand the range of views, issues and opportunities;
- Updated the Local Plan, acknowledging updated evidence and consultation responses received.

Chapter 4 Enabling healthy lifestyles and wellbeing

You Said

- General support, although concerns were raised in relation to potential delays to provision of health infrastructure and current capacity (and associated concerns of impact of population growth on this);
- Support for provision of sport and recreation that is accessible by public transport, with a focus on making spaces safe and inclusive;
- Need to improve facilities in the city.

We Did

- Prepared a Playing Pitches Strategy, Built Facilities Strategy, and Infrastructure Delivery Plan, providing supporting evidence for plan preparation; reviewed policies to include further consideration of and reference to physical activity;
- Developed a planning and health protocol to further reinforce links between planning and public health, and the Health Impact Assessment process and added reference to this in the local plan;
- Added a new policy specifically focussed on Hot Food Takeaways to the plan following review (previously included as a criterion within the strategic policy);
- Added reference to co-locating facilities within the plan;
- Added further refence to safety and inclusivity, and encouraging access to sport and activity for women and girls;
- Added reference to emergency services to policy in recognition of their role.

Chapter 5 Homes

You Said

- Support for focusing development in the city centre, including in terms of the sustainability of this location.
- Concerns about new housing development, stating that the area is too densely populated, the impact on the green belt, road congestion, and wanted to see infrastructure coming first.
- Some support was received for the management of HMOs.
- A number of respondents were supportive of the approached to residential standards, which will help to ensure that housing development meets the needs of the population. There was also support for the inclusion of accessibility design standards.

We Did

- Prepared evidence to support plan preparation, including Housing Needs Assessment, Housing and Economic Land Availability Assessment, Urban Capacity evidence and reflected the findings within relevant local plan policies including:
    - Updated the preferred housing mix for private and affordable housing in policies DM5.1 and DM5.2, to inform future development;
    - Added a policy on co-living to the plan;
    - Set out a range of site allocations within chapter 12, a number of which include potential for housing delivery;

- Updated Policy DM5.6 to include reference to HMO amenity standards, to ensure adequate space is provided for amenities and space within HMOs;
- Added further reference into the supporting text for Policy DM5.7 to highlight other types of housing/ accommodation that may provide an option for older people.

Chapter 6 Economy

You Said

- Support for city centre investment and regeneration, with some respondents highlighting Southend's role as a visitor destination, and the importance of balancing needs of tourism and night-time economies with the residential population;
- General support for the approach to the management of employment areas, and to skills provision;
- Some concern about capacity of training facilities within the city.

We Did

- Prepared an Economic Needs Assessment, Retail and Leisure Needs Assessment, and Visitor Accommodation Study, to inform plan preparation;
- Updated policy DM6.2 Employment and Skills to reflect guidance from Essex County Council on Employment and Skills Plans;
- Updated references to employment floorspace targets and associated projected job growth – reflecting the evidence base;
- Updated the approach to retail parks within Policy DM6.6, continuing to recognise the retail parks as locations for larger format units;
- Introduced a policy on new ways of working, addressing the shift in working patterns and arrangements, including for home working, and flexible workspaces.

Chapter 7 Urban Design, Character and Heritage

You Said

- Support for urban design/ heritage policies, noting that good design and accessibility add to the overall experience of city living;
- Support for the recognition of promoting active travel through the layout of development;
- Some concerns about the development of tall buildings, although some respondents commented that tall buildings within the existing urban area should be explored before green belt;
- Historic England welcomed Strategic Policy SP7, and in particular criterion 9 on heritage, which acknowledges the significance of Southend's historic environment in shaping the city's identity and contributing to a strong sense of place.

We Did

- Added further cross references to other relevant policies within the plan, to emphasise the importance of achieving well designed buildings and places;
- Added further reference to sustainable design and energy efficiency to Policy DM7.3 Tall Buildings;

- Added reference to ensuring consideration of anti-social behaviour and safety in design of buildings and spaces.

Chapter 8 Environment

You Said

- Support for the strategic policy approach, including in terms of the protection and enhancement of green and blue infrastructure;
- Support for including the tree canopy cover target in the plan;
- Some concerns were raised in relation to potential loss of green belt, including loss of agricultural land.

We Did

- Prepared a Strategic Flood Risk Assessment and Water Cycle Study;
- Prepared an updated Green Belt assessment in line with national policy;
- Prepared a viability assessment to consider economic viability of plan policies;
- Added reference to the new Local Nature Recovery Strategy into the supporting text for Policy SP8 in response to representation from Natural England;
- Added reference to sites of local importance into Policy SP8;
- Took forward the urban greening factor as a city-wide policy rather than targeted;
- Considered the requirement for safeguarding agricultural land as part of the overall site assessment process.

Chapter 9 Climate Change, Sustainable Design and Environmental Protection

You Said

- Support for climate-resilience aims, and embodied carbon and circular economy policies that prioritise reuse/ retrofit;
- Support for the approach to EV charging, however some concerns were raised in relation to costs;
- Concerns that higher density development and extra hard surfacing would add pressure to drainage system;
- Support for the agent of change principle, and for policy requirements that seek to minimise risks to the natural environment associated with contaminated land.

A number of respondents highlighted within their responses that Anglian Water had not been consulted as part of the preparation of the Southend new Local Plan, and/ or that Anglian Water had stated to them that there was no water capacity for future development.

The Council has engaged with statutory providers, including Anglian Water, throughout the preparation of the Local Plan, and Anglian Water along with other infrastructure providers have also been directly engaged with as part of the preparation of the Council's Infrastructure Delivery Plan (IDP). Anglian Water have advised there is sufficient capacity in the Waste Water Treatment Works for the plan period. Essex and Suffolk Water as water supplier to the city has not raised an objection to the plan.

For more information, see the Southend Water Cycle Study 2026.pdf

We Did

- Prepared a Strategic Flood Risk Assessment and Water Cycle Study to inform plan preparation;
- Refined the approach in Policy DM9.1 to embodied carbon and energy efficiency;
- Added reference to sports facilities within Policy DM9.3 in relation to the agent of change principle;
- Added a policy relating to MOD Shoeburyness in response to representations made by the Ministry of Defence/Defence Infrastructure Organisation.

Chapter 10 Transport and Connectivity

You Said

- Concerns regarding infrastructure provision and existing road capacity, and highlighting Southend's limited egress to the east;
- Support for the provisions the plan is making to encourage more walking and cycling, highlighting the importance of this to improving health and wellbeing;
- Concerns raised that the plan is optimistic about walking, cycling and public transport, however this is not matched by firm commitments or funding;
- Mixed responses to proposed parking standards, with some considering them inadequate and others too high;
- National Highways noted that they are satisfied proposals growth will not impact the Strategic Road Network.

We Did

- Prepared an updated transport assessment to inform plan making;
- Reviewed and updated parking standards;
- Added further reference to active travel within Policy SP10;
- Added policy criteria on the role of railway stations into Policy DM10.1, and its supporting text.

Chapter 11 London Southend Airport

You Said

- Concerned about any future expansion of the airport;
- Others supported the broad direction of the policy and its recognition of the airport's economic role.

We Did

- Engaged with London Southend Airport and reviewed representations received to update the policy;
- Recognised the potential for a multi modal transport hub at London Southend Airport Railway station.

Chapter 12 Neighbourhoods

You Said

- Support across the neighbourhoods in terms of the consideration of enhancements to each of the areas;
- Further emphasis should be placed on green and blue infrastructure;
- Some specific comments relating to site allocations within the neighbourhoods, some supportive, some raising concerns.

We Did

- Prepared an updated Housing and Economic Land Availability Assessment, Housing Needs Assessment, Economic Needs Assessment, Retail and Leisure Needs Assessment, and Visitor Accommodation Study to provide up to date evidence base on need;
- Reviewed the neighbourhood policies and refined including reference to emergency services in response to representations from infrastructure providers;
- Reviewed site allocations and included further detail, including potential quantum of development.

In relation to **Chapter 13 Monitoring** there was some general support.

1 Introduction

1.1 This statement has been prepared to comply with the requirements of Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 ("the Regulations").

1.2 The Regulation 18 consultation marks the start of the engagement stage of the Plan and represents the scoping stage to decide what should be included in it. Consultation on the Plan, including with key stakeholders helps to ensure that it is based on up to date, robust evidence. This is the third Regulation 18 consultation for Southend's Local Plan. Each stage of the plan preparation process is more detailed in policy scope and identification of potential site allocations, as shown in table 1.1 below.

Table 1.1: Public consultations on the Southend Local Plan

Stage	Dates of Consultation	Scope of consultation
Regulation 18 Issues and Options	March to April 2019	Sought views on the main issues that should be addressed in the Local Plan. No site allocations or policies were proposed.
Regulation 18 Refining the Options	July to September 2021	Sought views on three broad spatial options for future growth. Identified some potential site allocations.
Regulation 18 Preferred Approach with Options	July to October 2025	Sought views on draft plan policies. For some policies alternative options were proposed for comment. Identified some potential site allocations. A spatial option of a new neighbourhood on land north of Southend was also included for comment.

1.3 **Who we consulted** – A summary of engagement at the Regulation 18 Preferred Approach with Options stage is set out at Appendix 1. Section 2 of this report sets out our approach to collaboration on plan making, in particular working with neighbouring authorities, Essex County Council and other partners on strategic cross-boundary matters affecting South Essex. Our Statement of Community Involvement sets out how the community and other stakeholders are consulted on local planning policy documents, and the specific and general bodies that were consulted. These include:

- Statutory organisations including councils, infrastructure providers and government bodies as legally required or otherwise appropriate;
- Groups representing place, communities or other special interests;
- Local businesses, voluntary and other organisations;
- Planning and development industry stakeholders;
- The general public;

- Others who have expressed an interest in the Local Plan (over time we have built up an extensive database of organisations and individuals wishing to be involved in our consultations).

1.4 **How we consulted** – Further details of how we consulted on the Local Plan is set out in Appendix 1; a schedule of consultation events held are set out at Appendix 2.

1.5 **Summary of the main issues raised and feedback from key stakeholders** – Section 3 of this report sets out a summary of the main comments and issues raised during the consultation. Appendix 5 provides a summary of engagement with Southend Youth Council. Appendix 6 summarises the main points raised by key stakeholders, including neighbouring local authorities, infrastructure providers and government bodies as legally required or otherwise appropriate.

1.6 **Social Media Engagement-** a summary report on social media engagement is at Appendix 4.

1.7 **Sustainability Appraisal** – Section 4 sets out the comments we received on the Sustainability Appraisal and how these should influence the scope and content of the plan objectives and policies.

1.8 **How the representations will be taken into account in the plan -** Section 5 summarises what you said about the plan and what we will do in response to take the plan forward (this is also provided within the Executive Summary overview).

1.9 **Pre – consultation petition and other correspondence** - Prior to the start of the public consultation on the Regulation 18 draft Local Plan, a petition was received by the Council.[1] The title of the petition stated: "Protect our green belt – stop the secret 10,000 home development in Southend and Rochford." The ePetition ran from 1st April to 31st May 2025. 2,107 people signed the petition. Following the publication of the ePetition, 63 emails were received to the Local Plan team, between 9th June and 7th July 2025, writing to express "strong opposition to proposed New Towns Submission for 10,000 homes on land at Bournes Green Chase on the border of Southend and Rochford." This correspondence was received prior to the publication and public consultation period of the Regulation 18 Southend Local Plan Preferred Approach with Options and thus were not duly made representations. However, the broad thrust of these comments are consistent with the summary of representations presented in this report (particularly in relation to section 3b, whereby they include objections to loss of greenbelt and associated development). It should be noted that the Regulation 18 Southend Local Plan Preferred Approach with Options did not include a proposed allocation for land north of Southend, it presented an option and invited responses to questions posed.

[1] ePetition - Protect Our Green Belt – Stop the Secret 10,000-Home Development in Southend & Rochford – Southend-on-Sea City Council

2 Collaborative Working

2.1 The Council seeks to co-operate and engage with a range of organisations on strategic matters when preparing its new Local Plan. This positive approach will assist in influencing the evolution of the Local Plan. Whilst there is no duty to agree, the Council will endeavour to secure the necessary co-operation on strategic cross-boundary matters before submitting the Local Plan for Examination.

2.2 The new Southend Local plan is prepared in close collaboration with neighbouring authorities, including the South Essex Councils and other key stakeholders, to ensure it has regard to its strategic context. The Councils of Basildon, Brentwood, Castle Point, Rochford, Southend on Sea, Thurrock and Essex County Council have formed South Essex Councils to work together to promote prosperity and wellbeing in the regional and make it the place to live, visit and do business.

2.3 The services in the Greater Essex area are currently split between 15 Councils, forming part of a two-tier system. Upper tier authorities include Southend, Thurrock and Essex, with 12 other city, borough and district councils.

2.4 As part of the government's plans for Local Government Reorganisation (LGR), it was announced in March 2026 that within Essex, all 15 Councils are to be replaced with five unitary authorities by 1st April 2028. They will each have responsibility for preparing local plans, but in interim the government has advised that existing councils should progress their local plans. At the date of publication of this report, LGR proposals have been paused.

2.5 Throughout the Local Plan preparation process, the list of strategic matters and opportunities for joint working will be kept under review and influence the engagement and co-operation activities promoted. Southend City Council will develop new and/or build on existing established joint working mechanisms, as appropriate. Co-operation arrangements the Council propose to employ and/or consider can include, as appropriate:

- Joint Officer and Member meetings, committees and working groups.
- Commissioning of joint evidence base studies and reports.
- Joint or aligned plans across Council areas.
- Memorandums of Understanding as a framework for co-operation.
- Getting key decisions in writing from other authorities/bodies.
- Confirming understanding/intentions in writing Joint statements of policy/action Joint statements of co-operation/ Statements of Common Ground.

2.6 Throughout the local plan preparation process, neighbouring authorities, and those within the South Essex housing market area have indicated that they are unable to assist with meeting Southend's housing need. Conversely, Southend is unable to contribute towards meeting neighbouring authorities' housing need. For more details, please refer to the summary of responses from key stakeholders is included at Appendix 6, and previous local plan consultation reports[2].

[2] https://localplan.southend.gov.uk/evidence-documents

3 Summary of Responses

3.1 This section summarises the main comments and issues raised in relation to the Regulation 18 Local Plan Preferred Approach with Options document (this includes all submissions received including *inter alia*, key stakeholders, local residents, landowners/ developers etc). This feedback will be considered when refining planning policies and allocations, and evidence base, as appropriate as the plan progresses towards submission, independent examination and adoption.

3.2 Strategy, Objectives and Infrastructure (Strategic Objectives, Strategic Policies SP1, SP2 and SP3)

- An Infrastructure led approach needs to be properly planned for and funded, particularly in relation to any housing development and land north of Southend.
- Vision should be amended to state that people will be living healthier lives and that health inequalities will have reduced.
- Local Plan should include a detailed updateable Water Cycle Study/Integrated Water Management Strategy to assess water supply availability and waste-water capacity before allocating growth.
- Consideration of highway infrastructure and road capacity, as well as a focus on improving public and shared transport options and opportunities to encourage active and healthy lifestyles.
- Include further reference to education.
- Strategic Objectives should include further focus on increasing social housing provision.
- Strategic Objective 15 should include water efficiency alongside climate change and energy efficiency.
- Consider that there is a shortfall in essential infrastructure and health services.
- Concerns regarding potential loss of green belt, and potential development of new homes.
- Support for strategic objectives 2, 4, 16 and 17 especially in relation to delivering healthy neighbourhoods, promoting/protecting sports facilities and improving the quality and accessibility of green space.
- Welcome the plan's long-term vision for a sustainable, healthy and inclusive city.
- The plan needs to be updated to provide strategic policies and associated growth strategies covering 15 years from adoption.
- Support for Policy SP1, however concerned the policy does not provide an overarching commitment to meeting the needs of existing and future residents in respect of housing delivery.

3.3 Strategic Policy Option – Question on whether to develop a new neighbourhood on land to the north of Southend (Questions 3B.1a, 3B.1b, 3B.2a, 3B.2c, 3B.3, 3B.4)

- Objection to any development on the green belt land north of Bournes Green, stating it should remain green belt.
- The city cannot cope with further expansion because of traffic congestion, flood risks, water supply and wastewater, education overload and pressure on the local healthcare system.

- Highlights potential impacts on highway network, concerned it would worsen the road congestion for residents of Thorpe Bay and Shoeburyness.
- Objects to proposals to build on the green belt due to loss of high-grade agricultural land for farming.
- Retention of the area as green belt prevents urban sprawl, retains agricultural land, helps maintain air quality, provides amenity space, and supports biodiversity and wildlife.
- Support the provision of more housing especially affordable/family housing.
- Supports the development of a new north-of-Southend neighbourhood provided it includes a high proportion of green and blue infrastructure and SuDS.
- Welcomes the infrastructure-led approach and the flexible contribution model in the Infrastructure Delivery Plan, but urges early engagement, flexible on-site/off-site contributions, and early impact testing for transport and other infrastructure.
- Object to loss of golf course and request for a sport and recreation strategy for any new neighbourhood to determine on-site or off-site provision and to ensure the development promotes healthy, active lifestyles.
- Infrastructure that promotes sustainable transport is crucial given the already saturated highways network.
- Guiding principles seem thorough, would like to see more parks and green spaces being required to be delivered alongside development.
- Consider that provision for employment needs to be greater.
- Require heritage impact assessment in relation to any development with potential impact on scheduled monuments.
- Suggest amending criterion 4.vii (Q3B.4) to require highly water efficient homes and the inclusion of rainwater harvesting or greywater recycling.

3.4 Enabling Healthy Lifestyles and Wellbeing (Policies SP4, DM4.1 – DM4.2)

- Supports sport and recreation provision that is accessible by public transport and affordable to individuals and families.
- Plan vision should include that people will be living healthier lives and health inequalities will be reduced.
- States difficulties in accessing hospital, GP and dental appointments and further population growth would exacerbate this.
- Concerns regarding delays in provision of health infrastructure.
- Notes that people can access unhealthy food through delivery apps, comment that buffers around hot food takeaways may not have a big impact.
- Considers that more facilities desperately need to be embedded in communities but do not succeed alone.
- Support for use of Health Impact Assessments. Seek alignment with EPOA Planning and Health Protocol.
- Considers that we need to keep and improve sports facilities in the city.
- Requests that an additional policy requirement is included to SP4 which explicitly requires new development to be planned and designed to encourage physical activity.
- Consider further reference to making spaces safe and inclusive, including for female users of all ages.

- Sport and recreation provision should be accessible by public transport, walking and cycling. Place greater emphasis on active travel modes.

3.5 Homes (Policies SP5, DM5.1-DM5.8)

- Support for focus on making improvements in the city centre and focusing development here, noting the sustainability of the location.
- Supports the provision of mixed-use development (including residential) to sustain vitality.
- Objection to new housing development, concerns that the area is already too densely populated, and impact on green belt and biodiversity, as well as congestion on the road network. Infrastructure should come first.
- Residential development should be concentrated to the central area and brownfield only.
- Neighbouring authorities unable to accommodate any of Southend's identified need, including unmet need.
- Policy SP5 should be amended to include land north of Southend – the 9,500 included in Policy SP5 falls short of the identified housing need for Southend, objections raised in this regard.
- Well-designed homes should also be safe and secure, supporting health and wellbeing and sustainability agendas.
- Homes should have access to outside space to benefit health and wellbeing.
- Importance of retaining family housing noted.
- Supports residential conversions, noting they could be advantageous with careful consideration of potential impacts.
- Southend cannot sustain any additional building because existing roads, hospital and medical services are already at capacity.
- All properties should be accessible and adaptable.
- Should be a higher affordable housing target.
- Some support for linking affordable housing requirements to viability.
- Objects to affordable housing contribution in older people's housing as it adds significant cost to marginal projects.
- General support for residential standards in DM5.5, considered necessary to meet national requirements. Further consideration should be given to safety and security.
- Some support for Policy DM5.6 HMOs, comments that HMOs should be well managed and designed to ensure they do not have a negative impact on local communities.
- General support for Policy DM5.7. Comment that it should be clear affordable rented accommodation for older people should be delivered in partnership with a Registered Provider.
- General support for Policy DM5.8. Comment that there should be adequate support and suitable provision for vulnerable residents.

3.6 Securing a Thriving Local Economy and Visitor Destination (Policy SP6, DM6.1-DM6.5)

- Regeneration of high street is extremely important for residents and visitors. Investment in the city centre is needed to realise ambitions.

- Southend is a great visitor destination, and tourism plays an important role. Comment that tourism and evening economy need to be balanced with needs of residential populations, particularly seafront neighbourhoods.
- Recognition of the role London Southend Airport and Airport Business Park play in the economy.
- Welcome promotion of economic regeneration within Southend, including through the support of traditional fishing industries and the regeneration of Leigh Port, and of the Central Seafront.
- Local Plan should support hotels to allow them to adapt to market condition,
- Broad support for employment sector policy DM6.1.
- Concern with current capacity of training facilities within the city, and trades relating to the construction industry.
- General support for a policy approach to employment and skills (DM6.2). Recognition of the need to develop skills base locally. Some concerns around associated costs for development.
- General support for employment area policy (DM6.3) recognition of the need to protect employment land and jobs.
- Active travel links needs for sustainable business growth.
- General support for approach to retail and commercial centres (DM6.4). Healthcare uses should be included as potential uses in the city centre and other centres.
- Recognition of the role of retail parks, policy should take a flexible approach to them.
- Support for the use of Article 4 Directions in the city centre and district centres.
- Support for the approach to tourism and visitor accommodation, including Southend Airport as an area for hotel accommodation. Further support for hotel accommodation encouraged.

3.7 Urban Design, Character and Heritage (Policies SP7, DM7.1-DM7.6)

- General support for SP7 and principles for achieving good design.
- Welcome potential for a design code to be developed.
- Policy could include reference to urban greening in line with DM8.3.
- Consider that the density of the city should not be added to – including tall residential buildings.
- Good design and accessibility adds to the overall experience of living in a city.
- Support for the recognition of promoting active travel through the layout of development and creating safe and accessible routes.
- Include further reference to waterside development and designing for life saving equipment.
- All opportunities to support increased density should be pursued, including in low density areas. Increased densities can have benefits, although should be well managed to avoid loss of character, overcrowding.
- Should take a progressive approach to design.
- Some concerns around development of tall buildings.
- Support for the policy criteria relating to tall buildings, further clarity on evidence base, and comment that they should be explored for increasing housing supply rather than green belt development.

- Strengthen wording in relation to tall buildings and the airport, including reference to Civil Aviation Authority.
- Support for policy approach to advertisements and shopfronts (DM7.4), noting that control is required, and too much signage can make a place unattractive to visitors.
- Agree that waste disposal should be considered when planning residential or commercial development.
- Support for policy approach to heritage (DM7.6), heritage is important and helps to support tourism. Give consideration to impact on heritage assets outside of city boundaries.

3.8 Environment (Policies SP8, DM8.1-DM8.5)

- General support for Strategic Policy SP8, protection and enhancement of green- and blue-infrastructure and links to the Essex Nature Recovery Network.
- Enhance Policy SP8 by the inclusion in part 4 of another priority for Southend's green and blue infrastructure with reference to opportunities for sport and physical activity.
- Consideration could be given to roof top greening and greening of infrastructure like bus stops.
- Support for green belt policy in terms of preserving openness of the green belt, however opposition to loss of green belt land expressed, including loss of agricultural land.
- Object to green belt policy on grounds that further work is required in line with updated national guidance to review green belt boundaries.
- Welcome additional priority where applicable to seek contributions from development towards mitigations through RAMS.
- Object to SP8 on the grounds that is fails to provide adequate protection for ecological assets. Reference to Local Wildlife Sites also needed.
- General support for the approach to the green infrastructure network (DM8.2).
- Policy DM8.2 should provide adequate development management controls to protect Southend's biodiversity and should establish clear, enforceable requirements.
- Support for tree canopy cover target,
- Urban Greening Factor should be applied city wide.
- Highlights the loss of green infrastructure across the city and demand it be addressed
- Object to any development on green belt land, would worsen flooding and reduce areas for nature
- Supports retaining Grade I agricultural land for food security and habitat protection.

3.9 Climate Change, Sustainable Design and Environmental Protection (Policies SP9, DM9.1-DM9.5)

- Support climate-resilience aims.
- Support embodied-carbon and circular-economy policies that prioritise reuse/retrofit
- Proposes revising the water-efficiency standard from a household-based 110 l/p/d to a per-capita target of 90 l/p/d (ideally 85 l/p/d) to reflect best practice and varying occupancy.
- Emphasis on increasing urban trees and expanding green/blue infrastructure network to mitigate heat stress.

- Some support for approach to EV charging, although some concerns including in terms of upfront costs and implications for social housing provision – instead suggest future proofing development.
- Support for agent of change principle.
- Policy requirements to minimise risks to the natural environment associated with contaminated land and through changes in air quality, surface and ground water quality and noise are supported.
- Support for the policy requirements for the sequential siting of development, climate change and for considering the Shoreline Management Plan (SMP).
- Concerns that higher-density housing and extra hard surfacing will only add pressure to drainage systems and increasing potential risk of flooding.
- Support for protecting agricultural land, and concern about loss of green belt.

3.10 Transport and Connectivity (Policy SP10, DM10.1 – DM10.5)

- Existing road capacity, particularly the A127 and the Cuckoo Corner widening, is already insufficient.
- Support for policy DM10.1 because its provisions are designed to encourage more cycling and walking and physical activity makes a significant contribution to improving health and wellbeing.
- Highlights Southend's limited egress to the east and the inter-dependence of neighbouring districts' local plans on traffic flow.
- Concerns that while the Plan is optimistic about walking, cycling, and public transport, these ambitions are not matched by firm commitments or funding.
- Support for SP10 promoting sustainable and active travel modes
- "Infrastructure-led" description only covers internal infrastructure and fails to consider impacts on surrounding areas
- Disagrees with the draft parking standards, considering them to be inadequate.
- Comments that parking standards for developments in the city centre should be much lower, consideration should be given to zero parking given its sustainability.
- It is important to identify that cycling is playing an increasingly important role in getting people to and from rail stations in Southend.
- Support for the draft Local Plan's recognition of the railway's critical role in supporting growth, and the emphasis placed on securing necessary improvements and funding.
- Some concerns regarding the installation of telecommunication masts.

3.11 London Southend Airport (Policy SP11)

- Future opportunities to review the JAAP, particularly in relation to any wider masterplan for the area, could be considered as the JAAP's end date of 2031 approaches.
- Object to any expansion of the airport.
- Consideration needs to be given to safety.
- Ensure more rigorous enforcement of S106 agreement.
- Support the broad direction of Strategic Policy SP11 and its recognition of: the airport's regional economic role; the requirement to coordinate with Rochford District Council;

the intention to maintain a fit-for-purpose planning framework beyond the existing Joint Area Action Plan 2014 (JAAP).

- Encouraging surface access measures that have been implemented to minimise use of private car.
- The emerging Local Transport Plan and the Bus Service Improvement Plan both consider a mobility hub based at the Airport giving local residents easier access to the Airport station and a hub for buses and other modes of transport to integrate.

3.12 Place Specific Neighbourhood Policies

Eastwood

- Mature area with limited scope for additional development.
- Vision should include reference to GBI networks, with opportunities identified for walking and cycling routes that link with neighbouring areas.
- Opportunity to realise the potential of Cherry Orchard Park and adjoining spaces such as Edwards Hall Park.
- Support for continued enhancement of allocated employment areas at Aviation Way and Comet Way, including opportunities to enhance.
- Consideration of proximity to airport runway when considering site allocations for housing or sensitive uses.

Leigh

- Support for the Vision and Policy for Leigh.
- Agree that improvements are needed to A13 and A127.
- Vision should include reference to GBI networks, with opportunities identified for walking and cycling routes that link with neighbouring areas.
- Need more tree canopy cover to locations such as A13 London Road and Leigh District Centre.
- Support for opportunities to enhance public transport links and public realm, with opportunity to add further details to maps.
- Consider demand for services and healthcare capacity

Prittlewell

- Support for the refurbishment, expansion and renewal of Roots Hall, including improved public transport access, walking and cycling provision, and enhanced public realm.
- Questions why tree canopy-cover efforts focus on St Laurence instead of other depleted areas in Prittlewell including Fairfax Drive and West Road.
- Continued concerns about air quality and how this is managed.
- Recognise opportunities for enhanced access to railway stations. Prittlewell station serves key destinations including the football club and hospital, and accessibility should remain a priority.
- Support for key passenger transport corridor along Prittlewell Chase, which gets congested at peaks times, and priority measures for buses, and opportunities to enhance cycling. Support for bus access and transport corridor to London Southend Airport.
- Developments should contribute to increasing healthcare capacity.

Westcliff

- Need enhanced biodiversity in Westcliff, a densely populated area.
- Supports the Vision for Westcliff, although it is already densely populated and care should be taken that any improvements don't further reduce. space.
- Support for enhancements to the A13 London Road, and support for an active travel route that serves local schools, including a north-south cycle route, and traffic calming measures.
- Concerns regarding lack of green space in the area, and that potential development sites should be used as public green space or play areas rather than for development.
- Welcome requirements, where relevant, for development proposals to protect the foreshore and to incorporate nature-based solutions.

Southend Central

- General support for the vision and objectives for Southend Central.
- Supports concentrating development and improvements in the city centre, highlighting decline over past years.
- Developments should contribute to increasing healthcare capacity.
- Site allocation policy should identify the specific designated heritage assets and include a criterion requiring proposals to be supported by a Heritage Impact Assessment (HIA).
- Excess car usage is an issue in the city, and we should be actively encouraging guests to use public transport, reducing overall provision for car parking and instead focus much more heavily on other modes of transport.
- Support acknowledgement of the foreshore environmental designations, highlighting the Estuary's importance as a wildlife habitat.
- Welcome reference to The Royals Shopping Centre and potential for redevelopment in future.
- Queensway in need of regeneration.
- Improve the appearance of the High Street as a priority.
- Support improvements and enhancements to access to railway stations, encourage engagement with National Rail and service providers.

Southchurch

- General support for vision and objectives, noting A13 and A1159 would benefit from enhancement.
- Some concern expressed regarding potential intensification of development along Southchurch Road.
- Opportunity to reduce traffic in Southchurch Road and improve the environment for pedestrians.
- General support for site proposals.
- Developments should contribute to increasing healthcare capacity.
- Consideration should be given to flood risk.

Fossetts

- General support for the vision and objectives for Fossetts, a good area for development but should be infrastructure led particularly in terms of sustainable transport access.
- Concerns regarding loss of greenfield land, and loss of biodiversity.

- Developments should contribute to increasing healthcare capacity.
- Give the scale of growth proposed, it is critical that the impacts of development in this area on communities and amenities within Rochford District is fully considered.
- The sites include or are adjacent to the Scheduled Monument Prittlewell Camp and several listed buildings. To address potential heritage impacts, policy N7i should require a Heritage Impact Assessment.
- HEA264 - policy should make provision for appropriate mitigation to be secured for the impact on playing field provision.

Thorpe Bay

- Vision for Thorpe Bay only achievable if the areas around it are maintained, building on green belt land to the north will be detrimental.
- Road improvements are required.
- The policy should provide a definitive approach to Southchurch Park East and Thorpe Bay Golf Course. Questions why Southchurch Park East isn't shown on the map as a designated public space.
- Potential impact of any development to Land North of Southend should be considered.
- General support for place-based policies within the plan.
- Support for the place-based approach to protecting and enhancing green and blue infrastructure network, manage and promote tree planting, SuDs, and promoting sustainable travel.

Shoeburyness

- Bus services must be improved to encourage more active travel.
- Concerned with further residential development within the neighbourhood and on land to the north of Southend.
- Concerns with existing traffic congestion and the impact of development.
- Coastal defences should be a necessity for development.
- Shoebury Garrison Conservation Area should be maintained, and opportunities to enhance it taken such as fixing broken pavements.
- Concerns regarding lack of health care provision in the neighbourhood.
- Employment Areas are being well utilised and more are needed. Employment growth is limited by lack of appropriate employment land.
- Support the focus of Shoeburyness Railway Station as a mobility hub. Greater focus should be made on north-south connectivity.
- Want to see increased tree canopy in the east of Shoeburyness to replace trees lost at development sites, and for stronger flood-risk management.
- Objects to site proposal HEA137 Elm Road given its public land and contaminated. Concerned that schools are undersubscribed and another school is not needed here.
- Objects to site proposal HEA135 George Street, concerned about loss of playing field, and that it should be used a green space for residents or for tree planting. Concerned that eight houses is too many.

3.13 Delivery and Monitoring (Policy DM13.1)

- Some general support for Policy DM13.1.

- Concerned the KPIs are likely to incentivise high numbers of developments irrespective of impact to the city and surrounds.
- Monitoring should be supported with both quantifiable data and people's opinions.

4 Sustainability Appraisal

4.1 The Local Plan is accompanied by a Sustainability Appraisal (SA), that presents an appraisal of "the plan and reasonable alternatives" with a particular focus on appraising "significant effects", as required by the Environmental Assessment of Plans and Programmes (SEA) Regulations 2004. The full report can be found here: Local Plan Preferred Approach Sustainability Appraisal

4.2 The SA is a mechanism for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising positive effects. Under the majority of sustainability topics, the appraisal predicts an overall 'moderate or uncertain' positive or a neutral effect, but within this flags aspects of the Preferred Approach with merit and/or which generate a tension with sustainability objectives, that need to be explored further ahead of plan finalisation. A significant negative or 'moderate or uncertain' negative affect was found for homes, climate change mitigation, transport and water. Further evidence base work is ongoing on transport, flood risk and water resources to inform the Regulation 19 local plan and a final Sustainability Appraisal report will be published alongside the Proposed Submission local plan for publication.

4.3 Table 4.1 below sets out a summary of the responses received on this stage of the Sustainability Appraisal. The reports for the previous stages can be found here under section 15: Integrated Impact/Sustainability Assessment[3].

Table 4.1 Summary of responses to Sustainability Appraisal

Organisation	Comment
Natural England	Sustainability Appraisal Interim Report predicts that the Local Plan Preferred Approach will have a neutral effect on biodiversity, for both growth Scenario 1 (without LNOS) and Scenario 2 (with LNOS). However, it does flag a possible risk/uncertainty in respect of providing green infrastructure, including SANG to mitigate the recreational impacts of growth on the internationally designated Essex Estuaries, ahead of further detailed work through a Habitats Regulations Assessment (HRA). Development of land north of Southend would lead to the irreversible loss of the only extensive area of open countryside and Green Belt land in the city, contrary to the stated purposes of the Green Belt and would lead to the loss of agricultural land and potential mineral resources. These negative environmental effects appear to be reflected in the Rochford District and Southend on Sea Joint Green Belt Study. The current Local Plan Infrastructure Delivery Plan (IDP) identifies the need for considerable new greenspace under Scenario 1, and the potential to deliver this is currently uncertain. Additional uncertainties around SANG requirements are also recognised; we assume this is in

[3] https://localplan.southend.gov.uk/evidence-documents

	relation to the potential for largescale developments that will have an impact on internationally designated sites by themselves, to provide SANG mitigation.

5 What you Said and What We Did

5.1 Following the public consultation all the representations where collated and analysed, to inform the next stage of the plan making process. Table 5.1 below summarises what you said, and what action was taken to progress the local plan.

5.2 The Regulation 19 stage of the plan will represent the final pre-submission stage. Unlike the previous three Regulation 18 stages, which presented various issues and options for response, the purpose of the Regulation 19 stage is to invite formal representations on whether the plan is legally compliant, meets the Duty to Cooperate and is sound. All representations received on the next stage will be submitted to the Planning Inspectorate along with the draft plan.

Table 5.1 What you said and what we did

Local Plan section	What you said	What we did
Strategy, Objectives and Infrastructure	Some strategic objectives need to be strengthened by adding reference to health, water efficiency, marine biodiversity and climate change. Spatial Policies to be expanded to include details of proposed infrastructure requirements.	Refined strategic objectives and spatial policies and strengthened as appropriate in line with comments received. Specific infrastructure requirements to meet local needs over the local plan period set out in detail in the Infrastructure Delivery Plan, and referenced in policy as appropriate.
Strategic Policy Option: Question on whether to develop a new neighbourhood on land to the north of Southend	Concerns regarding the loss of green belt, agricultural land, impact on flood risk, biodiversity, highway network and existing infrastructure. Some support for provision of new housing in city, including family and affordable housing. Need for assessment of water supply and waste water capacity, transport network capacity, sports and recreation needs, and social infrastructure. Need for collaboration with neighbouring authorities and other key stakeholders	Set out policy approach to the land north of Southend and a potential new neighbourhood, considering all evidence gathered prior to, during and post consultation on the previous Regulation 18 stage, including infrastructure delivery plan and viability assessment.
Enabling Healthy Lifestyles and Wellbeing	Policy SP4 requirement for HIA should be strengthened including working with the Southend Public Health team, a clear process for embedding within the development management process and a quality assurance framework for reviewing HIAs. Consider incorporating Sport	Prepared playing pitch and built facilities assessment and action plans; developed a planning and health protocol with public health team; added a new policy to manage new Hot Food Takeaways; strengthened policies in relation to co-location of facilities,

Local Plan section	What you said	What we did
	England's Active Design Principles into the HIA checklist	emergency services and safety and inclusivity for women and girls.
Homes	Need for more affordable homes; need for inclusive, adaptable homes, concern about viability to provide affordable homes at proposed standard. Support for greater control over HMOs, and for proposed residential standards.	Prepared evidence including Housing Needs Assessment, Housing and Economic Land Availability Assessment and Urban Capacity evidence. Updated policies on housing affordability, mix, HMO amenity standards, housing options for older people; added a new policy on co-living.
Securing a Thriving Local Economy and Visitor Destination	Broad support for retention of employment areas and proposed release sites. Some concern about capacity of training facilities in the city.	Prepared an Economic Needs Assessment, Retail and Leisure Needs Assessment, and Visitor Accommodation Study; updated employment floorspace targets and policy for employment and skills; added a new policy on new ways of working.
Urban Design, Character and Heritage	Support for urban design/ heritage policies, designing developments for active travel. Some concern about development of tall buildings.	Added further cross references to other relevant policies within the plan, to emphasise the importance of achieving well designed buildings and places; Added further reference to sustainable design and energy efficiency, anti-social behaviour and safety.
Environment	Support for protection of the Green Belt and retention and enhancement of green and blue infrastructure network. Broad support for Urban Greening Factor to apply city wide.	Prepared an updated Green Belt assessment; took forward the Urban Greening Factor as a city wide policy; added reference to the new Essex Nature Recovery Strategy.
Climate Change, Sustainable Design and Environmental Protection	Support for climate-resilience aims, and embodied carbon and circular economy policies that prioritise reuse/ retrofit; Support for the approach to EV charging, however some concerns were raised in relation to costs; some concerns that higher density development could impact on surface water drainage. Support for agent of change principle.	Prepared a Strategic Flood Risk Assessment and Water Cycle Study; refined the approach to energy efficiency and embodied carbon; Added a policy relating to MOD Shoeburyness.
Transport and Connectivity	Concern about the capacity of existing transport network to cope	Prepared an updated transport assessment to inform plan

Local Plan section	What you said	What we did
	with local plan growth; support for provision of active travel modes.	making; Reviewed and updated parking standards; Added further reference to active travel within Policy SP10; Added policy criteria on the role of railway stations into Policy DM10.1, and its supporting text.
London Southend Airport	Some concerns about any future expansion of the airport; Others supported the broad direction of the policy and its recognition of the airport's economic role.	Engaged with London Southend Airport and reviewed representations received to update the policy, including in regard to safeguarding zones; Recognised the potential for a multi modal transport hub at London Southend Airport Railway station.
Neighbourhoods	Support across the neighbourhoods in terms of the consideration of enhancements to each of the areas. Further emphasis should be placed on green and blue infrastructure. Some specific comments relating to site allocations within the neighbourhoods, some supportive, some raising concerns.	Reviewed site allocations and included further detail, including potential quantum of development, following an update of evidence including Housing needs and Economic needs assessments. Refined reference to emergency services in response to representations from infrastructure providers.
Monitoring	Some general support for monitoring approach.	Established a monitoring framework to evaluate the effectiveness of plan policies.

Appendix 1 - Summary of Local Plan engagement

Consultation Process

Notification of the Local Plan consultation directly sent to individuals and organisations. This includes Essex authorities, statutory and infrastructure providers, developers, planning agents, local residents.	442 direct notifications (plus all staff email c.1,300)

Pre-Consultation Comments

Pre-consultation responses received, which have been acknowledged and recorded. These responses primarily related to the New Towns Taskforce bid, sent in a standard format, objecting to growth to land north of Southend	63 pre-consultation responses received

Your Say Southend

Notification of and links to the Local Plan consultation website on Your Say Southend. https://yoursay.southend.gov.uk/southend-new-local-plan	1,576 views

Social Media (*stats to 26.08.25*) and Videos

Social media campaign included thirty five posts across Facebook, X and LinkedIn. Total Reach was 4809k, Total Impressions 5553k, 1369 Total Clicks through to Local Plan website.	998 reactions 682 comments
Local Plan Video – introduction to the local plan *https://www.youtube.com/watch?v=80TC0xJ4qss*	455 views
Local Plan Video – co-produced with young people living, working and studying in Southend *https://www.youtube.com/watch?v=mbs13_QRU3U*	7,900 views
The Leader of the Council prepared a series of local plan videos, one discussing the local plan and the purpose of the document, followed by 6 additional videos discussing key themes of the local plan. *Southend-on-Sea City Council - YouTube*	Our Local Plan – 95 views, Theme 1- 41 views Theme 2- 35 views Theme 3- 29 views Theme 4- 18 views Theme 5- 23 views Theme 6- 46 views

Appendix 2 - Consultation Events Summary

Face to face engagement (including the two webinars) c.500 people directly engaged with.

Consultation Event	Date	Number of people attending (approx)	Key themes discussed
Southend Youth Council local plan steering group	11/06/2025	5	To plan for youth engagement in consultation
SAVS Networking Brunch	25/06/2025	40	To advise of forthcoming consultation
Chalkwell Residents Association	09/07/2025	30	Houses in Multiple Occupation, Green Belt, Infrastructure
Civic Centre drop-in	05/08/2025	20	Housing, infrastructure
Victoria Shopping Centre drop-in	06/08/2025	50	High street, housing, infrastructure
Leigh Community Centre	12/08/2025	10	Bus network, open spaces, housing
Leigh Town Council planning committee	12/08/2025	12	Housing, social infrastructure, environment
Shoeburyness Youth and Community Centre	18/08/2025	15	Traffic congestion, Green Belt, infrastructure
Southend District Pensioners Campaign	20/08/2025	40	Affordable Housing, Flood Risk, Green Belt, Social Infrastructure
SAVS Networking Brunch	26/08/2025	40	Reminder of consultation forthcoming events
SAVS Parent Ambassadors	26/08/2025	9	Social infrastructure, air quality, flood risk, nature, design and accessibility
SAVS hosted webinar	01/09/2025	25	Housing, infrastructure, transport, jobs, healthcare
Southchurch Plaza Centre drop-in	02/09/2025	35	Housing, infrastructure
Southend Business Partnership Executive	09/09/2025	25	Employment, transport, high street, environment
Southend Councillors drop-in	11/09/2025	13	Housing, infrastructure, environment
Southend Forum drop-in	12/09/2025	20	Employment, high street, environment
Southend Councillors drop-in	15/09/2025	20	Infrastructure, employment, environment
Civic Centre drop-in	16/09/2025	25	Transport, infrastructure
Southchurch Business Expo	18/09/2025	40	Infrastructure, affordable housing
Southend COPD support group	18/09/2025	30	Green belt, housing, infrastructure, transport
SAVS Parent Ambassadors	18/09/2025	9	Local business, high street, affordable housing
SAVS hosted webinar	23/09/2025	15	Housing, infrastructure

Appendix 3 - Summary of number of responses received

Table A3.1a Breakdown of all representations received by support/object/comment

The following table provides an overview of representations received across all sections of the plan (1,981 in total), and all representations excluding Section 3b (relating to the potential option of a new neighbourhood to land north of Southend). When considering responses to all questions (excluding section 3b) there were more responses in support than object.

All Representations (1,981 total)		
Support	Object	Comment
916 (46%)	826 (42%)	239 (12%)
All Representations (excluding Section 3b) (1,329 total)		
Support	Object	Comment
692 (52%)	417 (31%)	220 (17%)

Table A3.1b Breakdown of representations received on Section 3b only by support/object/comment

The table below provides a breakdown of representations received to Section 3b only. This addressed the policy option of a new neighbourhood to land north of Southend (652 responses in total to the six questions within this section of the plan). When considering responses to Section 3b only, there were more objections than support.

Representations on Section 3b (652 total)		
Support	Object	Comment
224 (34%)	409 (63%)	19 (3%)

Table A3.1c Breakdown of representations received on each question in Section 3b by support/object/comment

The following table provides an overview of responses to Section 3b by individual question to illustrate where responses were received. Q3B.1B asked whether land north of Southend should be **retained as green belt**. The results below therefore also include an overview of responses received to Section 3B **excluding Q3B.1B** to provide further clarity on the balance of responses received, in terms of support/ object.

Question	**Total**	**Support**	**Object**	**Comment**
3B (ALL Questions)	652	224	409	19
Q3B.1B – retain LNOS as green belt?	194	166	28	0
3B (ALL – Excluding Q3B.1B)	*458*	*58*	*381*	*19*
Q3B.1A – allocate LNOS for mixed use residential?	210	14	186	10
Q3B.2A – Green belt only released in conjunction with adjoining land in Rochford?	69	11	57	1

Q3B.2B – Green belt released regardless of whether adjoining land in Rochford is available?	77	6	70	1
Q3B.3 – Do you support the guiding principles that would apply to LNOS?	68	13	52	3
Q3B.4 – Should other criteria be incorporated into the guiding principles?	34	14	16	4

In summary, 652 representations were received on 6 questions within Section 3b:

- Q3b.1a (majority objection to allocating land north of Southend for mixed use residential led development) [210 representations received; 14 support, 186 object, and 10 comments]. Support 13%; Object 83%; Comments 4%
- Q3b.1b (majority support – for retaining land north of Southend as Green Belt) [194 representations, of which 166 support and 28 object]. Support 85%; Object 15%
- Q3b.2a (majority of respondents did not agree that Green Belt land north of Southend should only be released in conjunction with adjoining land in Rochford to provide a comprehensive new neighbourhood) [69 representations in total, of which 57 object, 11 support, and one comment].
- Q3b.2b (majority of respondents did not agree that Green Belt land north of Southend should be released for housing development regardless of whether adjoining land in Rochford District is made available) [77 representations in total, of which 70 object, 6 support, and one comment].
- Q3b.3 (majority of respondents object to the guiding principles) [68 representations in total, of which 52 object, 13 support and three comments].
- Q3b.4 (asked whether other criteria should be incorporated into the guiding principles, and overall the response was largely balanced between support and object) [34 representations in total, of which 16 object, 14 support, and four comments].

Figure A3.1 Breakdown of respondents by geographic distribution

The following map shows the geographic distribution of respondents who have made representations. There were a total of 445 respondents to this consultation, 387 of whom provided postcodes, with 385 of these being valid. 350 of the respondents (with valid postcodes) came from within the consultation area, and 35 from outside the city administrative boundary (including 22 from within Rochford District Council area). This analysis was generated with the assistance of AI.

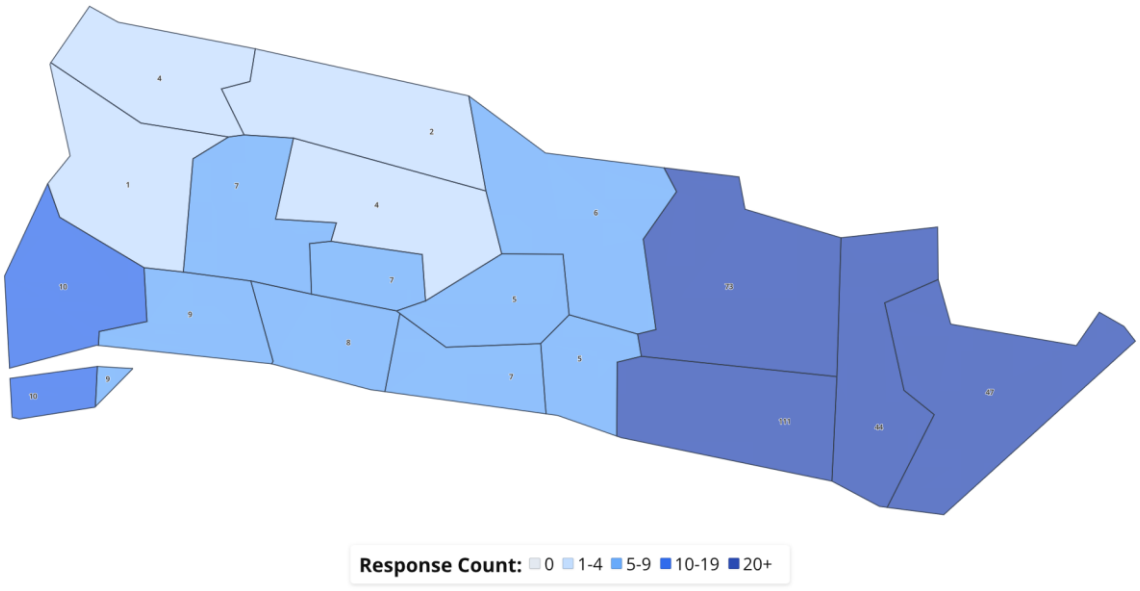
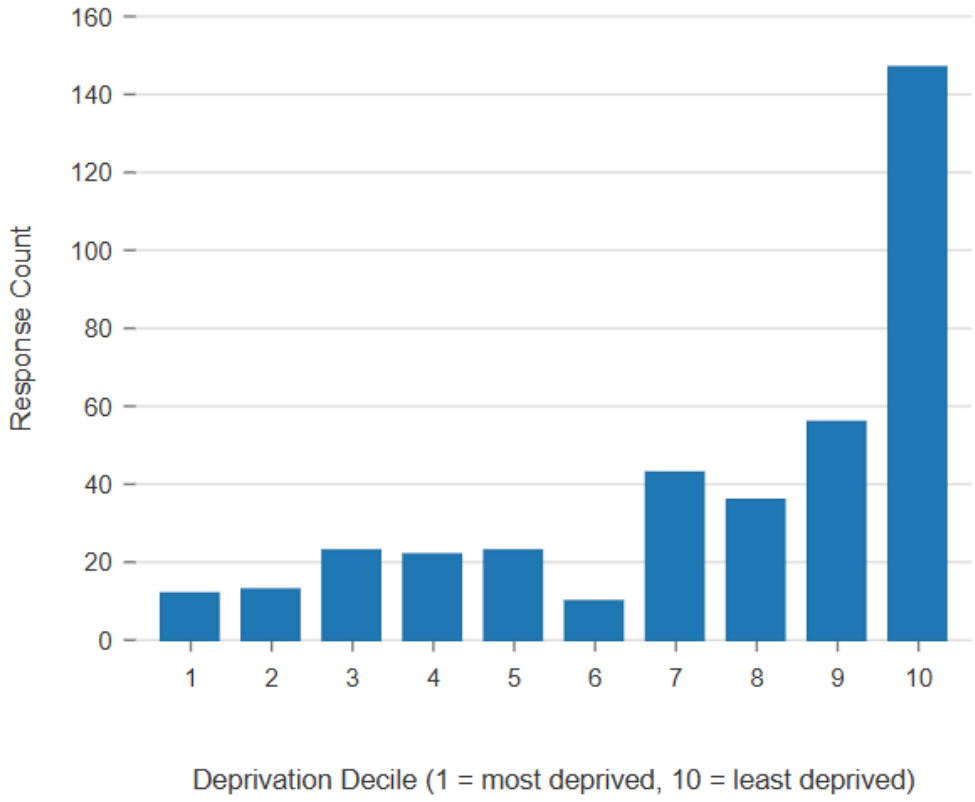


Table A3.2: Breakdown of respondents by multiple-deprivation indicators

Table A3.2 below indicates that the majority of representations were from the least deprived parts of Southend, with fewest responses received from the 20% most deprived areas. This analysis was generated with the assistance of AI.

Table A3.2: Respondent's postcodes by Index of Multiple Deprivation (2025)

Source: Local Authority (Upper Tier) IMD2025 (OSGB1936) | CommunitiesOpenData

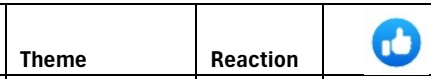


Appendix 4 - Social Media Engagement Summary

The public consultation started on 24th July 2025 and ended on 30th September 2025

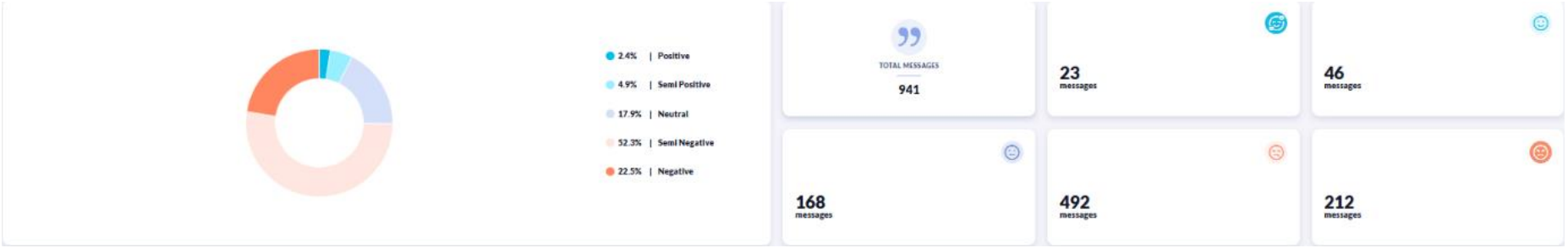
Table A4.1 Social Media Engagement

Date	Theme	Reaction								Comments	Shares	Views
Total		**9946**	**703**	**44**	**1**	**232**	**8**	**4**	**7**	**928**	**68**	**7951**
28/09/2025	Consultation closure reminder	7	5	0	0	0	0	0	0	0	2	0
26/09/2025	Theme 6- Your future-local identity and inclusion	788	1	0	0	1	0	0	2	7	0	777
23/09/2025	Consultation closure reminder	3	3	0	0	0	0	0	0	0	0	0
22/09/2025	Theme 5- Healthy Southend- community wellbeing and service	739	5	1	0	1	0	0	0	1	0	731
18/09/2025	Theme 4- Jobs, skills and local economy	956	4	1	0	3	0	0	0	5	0	943
15/09/2025	Theme 3-Green travel and transport	1324	12	0	0	1	0	0	0	11	0	1300
12/09/2025	Drop-in event, the forum	5	2	0	0	1	0	0	0	0	2	0
11/09/2025	Theme 2 -Green Southend- climate action and nature recovery	1332	7	0	0	7	0	0	0	16	2	1300

Date	Theme	Reaction								Comments	Shares	Views
09/09/2025	Theme 1- Managing HMOs responsibly	1922	8	0	0	2	0	0	2	7	3	1900
05/09/2025	Planning a smarter, greener future	142	47	3	0	15	1	0	0	70	6	0
22/08/2025	Virtual exhibition	1005	2	0	0	0	0	0	0	3	0	1000
18/08/2025	Supporting job growth and facilitate economic regeneration	45	21	1	0	0	0	0	0	21	2	0
05/07/2025	Help shape a healthier southend	18	8	0	0	0	0	0	0	7	3	0
29/07/2025	Coastal identity and vibrant neighbourhood	1520	523	36	0	191	6	4	3	717	40	0
25/07/2025	Launch of public consultation	140	55	2	1	10	1	0	0	63	8	0

- **36** posts across Facebook, X and LinkedIn. There were also another few posts on the NextDoor platform (as well as articles in our resident e-newsletter).
- **240,203** Total Reach (number of individuals who saw the posts: please note, Twitter doesn't provide this figure on the native platform, so the reach here isn't included)
- **258,002** Total Impressions (the total number of times Local Plan content has appeared on users' screens)
- **1,182** Total clicks through to Local Offer website
- **941** Total comments (some that were deleted natively, or removed automatically due to swearing are not included here)
- **926** Total likes

- **94** Total shares



Top performing posts (by the metric of "reach")

Thriving city by the sea (29 July) (177,981 reach)

General local plan promotion (25 July) (19,891 reach)

Smarter, greener future (5th September) (12,592 reach)

Appendix 5 – Youth Council Engagement

During the Preferred Approach with Options Regulation 18 consultation, a Southend Youth Council Local Plan sub-group designed and undertook a survey of Youth Council members about the Local Plan, following a presentation by the Local Plan team.

The survey generated 25 responses. The findings reveal strong support for the overarching vision of Southend becoming a sustainable, connected and vibrant coastal city, alongside a clear emphasis on housing affordability, environmental protection, public transport improvements, and the provision of community facilities.

Key messages include:

- Affordable housing is the dominant planning issue.
- Strong support exists for homes aimed at young people and first-time buyers.
- Environmental protection is regarded as equally important as economic growth.
- Better public transport is overwhelmingly preferred over additional road capacity.
- Most respondents support the Local Plan vision.
- Opinion is mixed regarding a potential new neighbourhood north of Southend.
- There is considerable concern regarding loss of green spaces, litter, and anti-social behaviour.

92% support the vision for a more sustainable, connected and vibrant coastal city

- Support: 22 respondents
- Support with concerns: 1 respondent
- Not sure: 1 respondent
- Do not support: 1 respondent

🏠 Housing is the Number One Priority

Most Frequently Raised Housing Issues

Priority	% of respondents
Housing affordability	100%
Support for disadvantaged groups	88%
Housing standards	48%
Housing for older people	40%
Flat/HMO issues	20%

Preferred New Homes

🥇 Affordable homes for young people

🥈 Flats and homes for first-time buyers

🥉 Family-sized homes

🌳 Environment Matters

Top Environmental Priorities

🌿 Protect green spaces

🌳 Protect trees and biodiversity

🏖️ Maintain Southend's beaches

🌊 Prevent flooding and coastal change

♻️ Reduce pollution and emissions

🚆 Better Transport, Not More Traffic

Most Popular Improvements

🥇 Better buses and train links

🥈 More cycle and walking routes

🥉 Improved railway stations

📶 Better digital connectivity

🚗 More parking received lower support

💼 Jobs and Growth

Future Industries to Prioritise

🎨 Creative industries

🏖️ Tourism and events

💻 Technology and digital

🛍️ Retail and hospitality

✈️ Airport-related employment

What Would Help Most?

✅ Skills and training opportunities

✅ Support for small businesses

✅ Growth of key sectors

✅ Revitalising the city centre

🏘️ New Neighbourhood North of Southend?

Responses

- Majority: "Maybe, depends how it's planned"
- Smaller group: "Bad idea, too much development"
- Minority: "Good idea, we need more homes"

Most respondents were open to the idea if infrastructure, affordability and environmental protection are addressed first.

🏢 Infrastructure is Essential -Importance of Facilities in New Developments

✅ Very Important: 22 respondents

🟨 Somewhat Important: 3 respondents

❌ Not Important: 0 respondents

Young people consistently highlighted:

- Health services
- Sports facilities
- Green spaces
- Community infrastructure

📣 Top Five Messages for the New Local Plan

1️⃣ Deliver genuinely affordable homes

2️⃣ Protect green spaces, wildlife and the Green Belt

3️⃣ Improve buses, trains, walking and cycling

4️⃣ Ensure development provides community facilities

5️⃣ Support skills, training and future-focused jobs

Notable Local Concerns Raised

🗑️ Litter and street cleanliness

🚓 Anti-social behaviour and policing

🌳 Loss of green spaces

🏚️ Too many flats and unaffordable housing

🚗 Parking pressures

🛝 Need for better parks and public spaces

Appendix 6 - Overview of comments from Key Stakeholders (specific and general consultation bodies)

Table A6.1 below summarises the main points raised by key stakeholders (specific and general consultation bodies) on the consultation.

Specific consultation bodies in plan making are required by law to be consulted on by local planning authorities when preparing Local Plans. These consultees provide technical advice on matters including transport, safety, heritage, and environmental matters to ensure legal compliance. They include: Environment Agency, Historic England, Natural England, and National Highways, and neighbouring local planning authorities.

The Council will continue to engage with partners on strategic issues including cross-boundary matters as the local plan is prepared.

Table A6.1		
Organisation	**Chapter/ Policy**	**Comment (summary)**
Rochford District Council		
Rochford District Council	General Comments/Duty to Co-operate	Given the close geographic, economic, and social links between our districts, it is crucial that local planning policies reflect shared priorities and ensure coordinated growth, infrastructure delivery, and environmental protection. RDC notes the focus on urban intensification and renewal but seek assurances that this strategy is deliverable within infrastructure limits. Any major employment or residential growth will have spillover effects and coordinated infrastructure investment must be secured across authority boundaries. The current long-term Vision for Southend, while aspirational, is not fully aligned with the Strategic Objectives of the Local Plan. The policies in the Local Plan should ensure that all elements of the vision and strategic objectives are appropriately covered including those relating to economic growth and regeneration and sustainable transport which are likely to be most impactful on Rochford residents.
Rochford District Council	Strategic Policy Option – new neighbourhood	The land to the north of Southend is being actively promoted and represents one of the few remaining large tracts of undeveloped land within the city boundary. While RDC does not seek to pre-empt or advocate for any specific allocation, it recognises that any consideration of this area must be underpinned by robust evidence and a comprehensive understanding of the potential impacts, both within Southend and in neighbouring areas, including Great Wakering and the wider Rochford District. Strategic-scale development may offer opportunities to deliver infrastructure improvements, such as transport, education, healthcare, and utilities, in a coordinated and viable manner. However, such proposals must be carefully assessed to ensure they are deliverable, sustainable, and responsive to local context. The challenges associated with brownfield redevelopment and infrastructure viability are acknowledged but should not be used to justify development without thorough scrutiny. As a general point, RDC considers it is imperative to retain a strong sense of separation between any growth areas and historic rural and semi-rural settlements in the vicinity, such as Great and Little Wakering, reflecting their strong identities and unique characteristics.

Rochford District Council	Infrastructure	RDC supports the principle of infrastructure-led growth as set out in the Southend Local Plan Preferred Approach. However, the Council notes that the plan currently lacks sufficient detail regarding the mechanisms through which infrastructure will be funded, delivered, and coordinated across administrative boundaries. Given the scale of growth proposed and the acknowledged shortfall in housing delivery, it is essential that infrastructure provision is not only aspirational but also viable and deliverable. RDC therefore urges Southend City Council to engage early and proactively with neighbouring authorities, Essex County Council, and infrastructure providers to develop a robust and coordinated infrastructure strategy that supports sustainable growth across the wider South Essex area.
Rochford District Council	Health and Wellbeing	RDC supports the aims and direction of Strategic Policy SP4 and welcomes SCC's continued commitment to creating healthy, inclusive, and safe environments that promote health and wellbeing. To ensure effective implementation of Policy SP4, RDC recommends the development of a comprehensive Health and Wellbeing Guidance document, which sets out in detail how the policy's objectives will be delivered in practice. This guidance should include clear criteria and methodologies for conducting Health Impact Assessments (HIAs), in line with Public Health England guidance. Furthermore, RDC strongly encourages the submission of HIAs at the pre-application stage, as this allows for early identification of potential health impacts and effective integration of mitigation measures into the design and planning process.
Rochford District Council	Housing	RDC expresses concern that the Southend Local Plan does not propose to meet the city's full housing need, as calculated using the Government's standard methodology. The proposed housing target of 9,500 dwellings falls significantly short of the assessed need, with a shortfall of over 11,000 homes. RDC recommends that SCC does need to consider the proposed option for a new neighbourhood to the north of Southend, which could deliver housing at scale alongside strategic infrastructure improvements. Failure to meet housing need within Southend may result in increased pressure on Rochford District's existing housing, Green Belt land, services, and infrastructure. Even with the potential delivery of 5,000 dwellings in a new neighbourhood to the north of Southend, a substantial shortfall of at least 6,575 dwellings would remain. RDC wishes to make clear that it is not in a position to accommodate unmet housing need arising from Southend. Rochford District faces its own significant housing pressures, infrastructure constraints, and environmental sensitivities, including extensive areas of Green Belt and coastal habitats, which limit its capacity to absorb additional growth from neighbouring authorities. It is therefore essential that SCC explores all reasonable opportunities to meet its own housing need within its administrative boundary. RDC recommends that SCC undertakes further evidence-gathering to support this. This would help ensure that Southend residents have access to housing within their own city, and that growth is planned in a sustainable and locally appropriate manner.

Rochford District Council	Economy	RDC agrees with the general strategic approach to economic growth and the visitor economy and suggests close collaboration between Southend City and Rochford District to overcome collective challenges and barriers to economic growth, and to exploit collective opportunities – particularly in terms of cross-boundary commercial opportunities or infrastructure projects that will grow the wider subregional economy.
Rochford District Council	Environment	RDC supports the general aims of Strategic Policy SP8 but considers that paragraph 4 of Policy SP8 be strengthened to explicitly reference accessibility. Green and blue infrastructure must not only be provided but should also be easily and safely accessible by foot for local residents, to maximise benefits related to recreation, active travel, public health, and social inclusion. DM8.1 should address grey belt and previously developed land in the Green Belt.
Rochford District Council	Climate Change	RDC supports Strategic Policy SP9 and welcomes its focus on climate change and environmental protection. To strengthen the policy, reference should be made to paragraph 162 of the NPPF, which requires plans to take a proactive approach to climate change-addressing long-term risks such as flooding, coastal change, water supply, biodiversity, landscape, overheating, and drought. Policies should also support appropriate measures to ensure the future health and resilience of communities and infrastructure to climate impacts. RDC supports the policy and encourages continued cooperation on cross-boundary climate resilience.
Rochford District Council	Transport	RDC must note that, at the time of this consultation, it has not been provided with access to the full Transport Assessment that underpins the draft Local Plan. Without this, it is not possible to fully assess the potential impacts or identify the necessary mitigations required to support coordinated growth across Southend, Rochford, and the wider South Essex area. Although RDC has not had access to the full Transport Assessment, we have been provided with a high-level overview of some modelling outputs. These suggest that certain growth scenarios could result in significant impacts on key routes within Rochford District, including Sutton Road, Southend Road, Ashingdon Road, Shopland Road, Eastwood Road, and Daws Heath Road. Junctions such as the Anne Boleyn Roundabout appear particularly vulnerable to increased congestion. These assessments, however, do not yet account for Rochford's own growth projections or emerging site allocations. It is therefore imperative that further cross-boundary work is undertaken to develop a coordinated approach to transport modelling and infrastructure planning. Whilst we can therefore only comment broadly, RDC supports strategic transport improvements that benefit both districts. However, any major infrastructure—such as a Rapid Transit Corridor or new junctions—must be planned collaboratively to avoid adverse impacts on Rochford's road network, environment, and communities. Joint transport modelling and infrastructure planning are essential. We also note that Essex County Council is currently consulting on its emerging Local Transport Plan. It is essential that Southend's Local Plan proposals align with the broader strategic vision and specific projects identified for South Essex to ensure integrated and effective transport connectivity across

		authority boundaries. In the event of a new neighbourhood being planned to the north of Southend, RDC strongly recommends that the need for additional walking, cycling and bus routes not previously identified as priorities are considered. This could include enhancing connections westwards, towards Rochford and Southend Airport, and eastwards towards Great Wakering.
Rochford District Council	London Southend Airport	The respective councils have a strong working relationship with the Airport and will continue to work constructively in the event of future proposals for growth. Future opportunities to review the JAAP, particularly in relation to any wider masterplan for the area, could be considered as the JAAP's end date of 2031 approaches. Welcome focus on the sustainable development of London Southend Airport and a mobility hub centred on its railway station, which is currently underutilised as an accessible transport resource from the local community.
Rochford District Council	Neighbourhoods	Support measures to improve public transport, walking and cycling connectivity between Eastwood and Rayleigh/Rochford (including through respective Local Cycling & Walking Infrastructure Plans (LCWIPs) and Local Transport Plans (LTPs). We would also welcome close collaboration in jointly realising the potential of Cherry Orchard Country Park and adjoining spaces, including Edwards Hall Park, for biodiversity and nature conservation, as well as recreational open spaces and sustainable visitor attractions. Concerning that Fossetts policy does not explicitly consider the impact to the north of the administrative boundary and that no consideration appears to be made of the potential to improve transport connectivity and other linkages to employment sites and amenities in this direction. We urge a greater focus on better connecting Shoeburyness and Great Wakering especially for public transport, cycling and walking, but consider it imperative to retain a strong sense of separation between any growth areas in Shoeburyness and nearby Great Wakering, preserving the latter's semi-rural character.
Castle Point Borough Council		
Castle Point Borough Council	General Comments/Duty to Co-operate	We acknowledge the ambition and scope of SCC's Preferred Approach, particularly its emphasis on regeneration, infrastructure-led growth, and environmental resilience. The proposals represent a significant step in shaping the future of Southend and the wider South Essex sub-region. However, there are several areas where CPBC wishes to provide comment and seek further engagement. We will continue to engage with SCC through the Duty to Cooperate and the South Essex Councils (SEC) partnership, and welcome further dialogue as the Local Plan progresses toward Publication.
Castle Point Borough Council	Infrastructure	CPBC shares SCC's concern about pressures on the A127 and A13 corridors. These routes are vital for Castle Point residents and already experience significant congestion. Growth at Fossetts Farm and any future Green Belt release must be supported by strategic transport investment. We urge SCC to ensure that its Infrastructure Delivery Plan includes measures that directly benefit Castle Point communities, such as junction upgrades, enhanced public transport services, and active travel links that extend across boundaries.

Castle Point Borough Council	Housing	CPBC is unable to meet its own standard method housing target and, as such, cannot accommodate unmet need from neighbouring authorities. We therefore advise that CPBC would not be in a position to contribute to SCC's unmet housing need. This position has been consistently communicated through Duty to Cooperate engagement and reflects the borough's physical and environmental limitations. We encourage SCC to continue exploring options within its own boundaries and to work closely with RDC, whose spatial strategy remains undecided following the recent withdrawal of support for the joint New Towns proposal. We would also encourage SCC to further explore evidence around local housing needs, the capacity of the housing market and the capacity of the environment.
Castle Point Borough Council	Economy	Investment in Southend's retail and leisure offer should not undermine the vitality of Castle Point's own town centres. We encourage SCC to consider joint approaches to economic development and inward investment that support the wider South Essex economy.
Castle Point Borough Council	Environment	Environmental and flood risk management is another area of shared concern. CPBC supports SCC's emphasis on biodiversity net gain, coastal resilience, and green infrastructure. We recommend joint working with CPBC, RDC, and the Environment Agency to ensure that flood defence strategies are consistent and that ecological networks are connected across local authority boundaries. We also note that Castle Point's Country Parks, particularly Hadleigh, currently serve as key green space for Southend residents. This should be acknowledged in SCC's open space strategy and reflected in future infrastructure planning and funding mechanisms.
Essex County Council		
Essex County Council	General Comments	Support and will continue to work and contribute cooperatively with SCC in the preparation of the new Local Plan and seeks engagement by SCC to assist and refine strategic and cross boundary matters. This includes the refinement of the strategy and spatial options, proposals and policies to deliver a sustainable pattern of growth (together with supporting evidence), within the challenging plan preparation timetable. This will ensure ECC's statutory roles and responsibilities are raised with SCC and can be addressed and delivered appropriately through the plan making process, wherever there is strategic and cross boundary impact. In accordance with the Duty to Co-operate, ECC will assist and contribute cooperatively to the preparation of the local plan, particularly within the following broad subject areas: Evidence base; ECC assets and services; Sub-regional and broader context; Policy development; Inter-relationship between Local Plans. ECC seek to enter into a Statement of Common Ground (SoCG) and where applicable enter into a Memorandum of Understanding with SCC and RDC to address potential strategic and cross boundary matters in accordance with NPPF (paragraph 24-28) and the Duty to Co-operate. ECC recommend SCC engage with ECC on requirements relating to ECC infrastructure and services, including but not limited to education (all areas) and skills, surface water management,

		minerals and waste, waste management, Adult Social Care and matters relating to public health, economic growth and digital connectivity, libraries, and advocate for climate change.
Essex County Council	Strategy, Objectives and Infrastructure	Welcome the preparation of the Plan, note engagement to date and broadly support the vision and strategic objectives subject to SCC considering recommended changes, additional policies and further evidence to secure and deliver infrastructure requirements. Broadly welcome the preferred Spatial Principles (SP1) for an infrastructure led approach and recommend the inclusion of principles in relation to large scale developments with updated guidance provided. Additional detailed evidence is required for ECC to be able to fully assess and comment on the impacts, opportunities and requirements for the full range of infrastructure and services as it relates to spatial options and policies with a strategic and cross boundary impact. ECC will assist in this process and acknowledge that SCC has engaged with ECC on the preparation of the emerging transport evidence and Infrastructure Delivery Plan (IDP). Additional evidence and detailed policies for infrastructure planning and delivery are recommended to secure developer contributions, with implementation and delivery mechanisms that are viable and deliverable (including funding, phasing, and stewardship); and that Infrastructure Delivery Strategies are in place for major infrastructure requirements, with a clear funding plan. SO15 should be expanded to include mitigation of the urban heat island effect; SO16 should include reference to the Local Nature Recovery Strategy; SO23 should acknowledge the wider role of the airport for domestic and international passenger and freight connections; SP1 should include reference to maximising job creation through mixed use development; Spatial Principles for Large Scale Development should have separate design principles e.g. TCPA and ECC Design Guide; SP2 to clarify and evidence how the plan has met the requirements of NPPF 147c where every effort must be made to provide for unmet housing need; SP3 should be expanded to include infrastructure requirements covering infrastructure implementation and delivery (including funding, phasing, delivery mechanisms and stewardship, and viability). This should be supported by a separate Development Management Policy to provide the mechanism to secure, mitigate, fund and deliver Infrastructure and service requirements, including any major new infrastructure (strengthening Policy DM4.1). Definition of Infrastructure should be included in the Glossary.
Essex County Council	Strategic Policy Option – new neighbourhood	If SCC progress the spatial option that includes a new neighbourhood within SCC (and on the RDC/Essex boundary), additional evidence will be required and SCC will need to continue to work collaboratively with ECC (and RDC) to explore the requirements through a plan led approach to ensure any proposal and supporting infrastructure is viable and deliverable and not a cost burden on the public purse. If both SCC and RDC seek to develop land near or on the administrative boundary through their emerging local plans, these should be explored jointly through the local plan process, through a structured and close working partnership arrangement between SCC, RDC and

		ECC. Guiding Principles should include a requirement for a masterplan, 20% Biodiversity Net Gain, and reference to the Local Nature Recovery Strategy.
Essex County Council	Health and Wellbeing	Policy SP4 should align with the emerging Essex Planning Officers Association Planning and Health Protocol. ECC recommend a separate Hot Food Takeaway policy.
Essex County Council	Housing	Clarification and additional evidence are sought to demonstrate how the preferred spatial strategy meets the full requirements of the NPPF paragraph 147c, prior to the submission of the Plan. SCC will need to demonstrate through the Duty to Cooperate and SoCG with their neighbouring and nearby authorities that they have made appropriate efforts to engage on its unmet housing need.
Essex County Council	Economy	ECC recommend SCC engage with ECC on employment allocations if Options outside SCC are progressed.
Essex County Council	Environment	Policy SP8 should include reference to "have regard to" the Essex Local Nature Recovery Strategy. Minerals Safeguarding Areas should be defined in the local plan and included on the proposals map, so that known locations of specific minerals are not sterilised, whilst not creating a presumption that defined resources will ever be worked. Reference should be included in DM9.5 and supporting text. The Plan should be expanded to detail SCC's intention to co-operate with neighbouring authorities to meet mineral needs that cannot be met through allocations within the plan area. Reference should be made to the Essex Air Quality Consortium and Essex Air Quality Strategy and successor document. Engage with ECC and refer to the requirements of the SuDs Design Guide for Essex, where development is near or on the boundary of Essex (including minor developments). SCC should prepare a Southend Water Recycling Study to replace the 2011 South Essex Water Recycling Study.
Essex County Council	Climate Change	ECC recommend SCC apply the latest pan Essex model policies and evidence in full within Policy DM9.1 in relation to Operational Energy and Carbon (Net Zero in Operation) and Embodied Carbon, as the most up to date and relevant evidence appended to the response. The water efficiency standard of 110 litres per person per day (l/p/d) should be changed to 85l/p/d, as recommended in the East of England Shared Standards in Water Efficiency for Local Plans. The default standards consistent with Building Regulations should be deleted, as this does not reflect the water scarcity of sufficient fresh-water availability in what is the driest county in Britain. SCC should prepare an up-to-date Water Cycle Study.
Essex County Council	Transport	ECC as Transportation and Highway Authority submit a holding response and reserve comments on the draft Plan and IDP (and Annex) up and until ECC has received the published Transport Assessment (TA) for review. This is necessary to enable ECC to review, verify and assess the modelling, impacts and proposed mitigation in relation to the Essex transportation and highway network.

Essex County Council	London Southend Airport	ECC seek engagement by SCC on the proposals for London Southend Airport including a potential transport hub to be explored under the Duty to Cooperate.
Essex County Council	Infrastructure	Further ongoing engagement will be required by SCC with potential neighbouring host authorities of RDC and CPBC and ECC as an upper tier authority as an infrastructure and service provider.
Essex County Council	Neighbourhoods	Suggest all neighbourhoods include green and blue infrastructure networks and walking and cycling networks link with the wider area in RDC and CPBC areas.
Essex County Council	Sustainability Appraisal	This draft Plan is supported by an interim Sustainability Appraisal which supports the inclusion of Spatial Plan Option 3b. However, the accompanying Transport Assessment has not been available for review and comment as part of this consultation, by ECC as the neighbouring Transportation and Highways Authority. It is, however, acknowledged that SCC has engaged ECC under the Duty, in respect of emerging transport evidence, in addition to the joint regular meetings established with the South Essex authorities, that explore strategic and cross boundary matters. The sustainability appraisal should be updated to have regard to the Essex Open Legal Advice (OLA) on energy policy in plans.
Essex County Council	Health Impact Assessment Matrix	Should be strengthened including working with the Southend Public Health team, a clear process for embedding within the development management process and a quality assurance framework for reviewing HIAs. Consider incorporating Sport England's Active Design Principles into the HIA checklist.
Basildon Borough Council		
Basildon Borough Council	General Comments	Basildon Borough Council welcomes further engagement with the Southend City Council to ensure that the observations raised in this response are duly considered and would like to continue working together on strategic planning priorities through the Duty to Co-operate.
Basildon Borough Council	Strategic Policy Option – new neighbourhood	The proposed new comprehensive neighbourhood on Green Belt land north of Southend, is supported in principle to allocate approximately 4,000 to 5,000 new homes, commercial floorspace, strategic parkland and new infrastructure as a reasonable alternative to address the unmet housing need. Further assessments and ongoing discussions are required to ensure the allocation is appropriate and supported by the suitable delivery of infrastructure.
Basildon Borough Council	Housing	Basildon Borough Council fully appreciates the scale of the challenge and complexity of planning for housing. However, as the availability of brownfield sites in Basildon borough is insufficient to meet our own housing needs, the Council must respectfully advise that it is unlikely to be able to assist Southend City Council in addressing any of its potential unmet needs at this time.
Basildon Borough Council	Economy	Basildon Borough Council are supportive of the approach Southend City Council has taken to identifying its employment land needs and job requirements and its proposed spatial strategy for accommodating them. Job growth will arise from both the intensification and diversification of existing businesses and from new employment allocations.

Basildon Borough Council	Transport	Southend City approach to accommodating growth through urban regeneration will have an effect on the local road network and the strategic road network in South Essex. Any development in this area would need to be supported by transport modelling which makes realistic assumptions about modal shift in this settlement. It would need to be supported by transport infrastructure improvements. It should also need to contribute to improvements on the wider strategic road network including the A127, A13/A1159 and A130.
Chelmsford City Council		
Chelmsford City Council	Strategy, Objectives and Infrastructure	While SCC faces challenges to development within its administrative area, CCC considers that SCC should be seeking to meet its housing target through its Local Plan and note that the Housing and Employment Land Availability Assessment Report published in 2020 recommended that policy amendments and releasing existing protections could boost housing development.
Chelmsford City Council	Housing	In response to the Chelmsford Local Plan Issues and Options Consultation Document 2022, SCC submitted a request to CCC on whether any of Southend's identified housing need, including unmet needs, could be accommodated within the Chelmsford authority area. CCC subsequently reported that they were unable to do so, and we reiterate that this remains the situation. CCC welcomes the approach taken by SCC to accommodate future need for Gypsy and Traveller sites according to a planning criterion.
Thurrock Council		
Thurrock Council	Strategy, Objective and Infrastructure	Thurrock is currently progressing the preparation of its own Local Plan and continuing the work that is necessary to identify sites that are capable of delivering its own housing need. In addition to work undertaken to date to identify sites, other crucial evidence work is continuing that will influence the final outcome of this, including for example a Green Belt and Grey Belt Assessment. Anticipate that this and other relevant evidence will have been completed towards the end of this year. At that point we should be able to establish whether sufficient land has been identified as available and deliverable to meet Thurrock's need. As you will likely be aware, Thurrock faces similar challenges in meeting housing need to the other authorities in South Essex.
Parish Council		
Leigh Town Council		
Leigh Town Council	Strategic Policy Option – new neighbourhood	Leigh-on-Sea Town Council has concern regarding the Bournes Green development proposed in the New Local Plan. Given the implications for all infrastructure, and in particular highways, and the pressure thereon and other major social and medical services, which will have effects across the City, including Leigh. Leigh is heavily constrained by lack of sufficient infrastructure generally and bears a heavy load in terms of traffic both along the London Road and through the town, the latter being often subject to standing traffic for long periods. Leigh-on-Sea Town Council would support the City Council making as robust a case as is possible to reduce the housing targets and thus prevent the loss of valuable green belt land and appreciates that this will require a very strong

		evidence base, given the push for ever more housing and government targets overriding long held policy restraints.
Leigh Town Council	Neighbourhoods	Leigh-on-Sea Town Council notes the allocation of Leigh Police Station (Allocation HEA272) within the Local Plan. However Leigh-on-Sea Town Council suggest that this policy needs to be more flexible and meet the needs of the town, which is not for more housing, and would urge the Council to look at retaining the Police Station in as much community usage as possible, as CAB, hot desking facilities for local businesses and potential for a banking hub, as there are no facilities in Leigh for banking for a population of 22,000 residents. Southend-on-Sea City Council should also give serious consideration to erecting an extra deck of car parking on the upper and lower levels of the Elm Road Car Park. This would increase capacity which would increase revenue, increase footfall into Leigh Broadway and beyond, which will support small businesses in the town, reduce parking congestion on surrounding residential roads, and ease the over trafficking of the central area of Leigh. Tree planting should reflect a high tree canopy target of 15% in Leigh, as the tree canopy is currently under 10% and the current target for Leigh is between 12% and 15%.
Other Statutory Consultees		
Environment Agency		
Environment Agency	Strategy, Objectives and Infrastructure	Policy SP2 - Given the amount of growth proposed, across a number of sites within the Southend area, we would expect to see a detailed assessment of water supply availability as well as capacity for the Waste Water Treatment Works (WWTW's) that serve the district. We therefore strongly recommend that an updateable Water Cycle Study (WCS)/Integrated Water Management Strategy (IWMS) is produced. It will also help early identification of where future investment may be required in wastewater infrastructure and to ensure sustainable water supplies are available to support growth, which can help align with water company investment planning. WCS/IWMS should be seen as an opportunity for the LPA as it will help ensure growth is able to be delivered in a sustainable way and crucially reduces the risks of any issues being found at a later stage. The Local Planning Authority should be satisfied that when allocating growth within a WWTW catchment, it will have sufficient capacity to take wastewater flows associated with any proposed development. If sufficient capacity is not available or identified to be planned for in future investment by the water company in line with anticipated phasing of development, then we may need to raise concerns on the deliverability of the future Local Plan as it comes forward. Policy SP3 – should specifically mention wastewater infrastructure. Part 2. vii of SP3 addresses "utility improvements including flood prevention". We note that this has been informed by the draft Infrastructure Delivery Plan. We would prefer to see flood risk management infrastructure listed as a separate item e.g. "flood risk management assets resilient and adaptable to manage the impacts of climate change." Reference should also be given in the Local Plan to the fact that

		contributions will be sought to aid future improvements and raising of flood defence infrastructure.
Environment Agency	Environment	Welcome adoption of optional higher standard of 110 litres/person/day, but local plan should include more ambitious standard in Shared Standards of up to 85 litres/person/day for residential development and full credits in BREEAM water calculator for non-residential. Standard to be justified by up to date evidence e.g. Water Cycle Study. Policy SP8 should refer to protection of Seagrass beds at Two Tree Island, Benfleet Marshes and Foulness (which are nationally significant) and natural flood risk management. Reference to need to partnership working to ensure continued resilience of C2C rail line through Hadleigh Marshes area should be strengthened. BNG policy should also include reference to watercourses. The 'riverside strategy' approach advocated by the Environment Agency aims for upgrades of coastal defences to be integrated into wider development and enhancement of the riverside. A Riverside Strategy approach is particularly important in Southend where an appropriate balance must be struck between protecting environmental assets and achieving coastal resilience, and the tourism role as an economic driver. Potential partners could be detailed to strengthen this further.
Environment Agency	Climate Change	Policy DM9.2 - Ground source heat pumps could have impacts on the water quality or aquatic ecology and may require an abstraction licence and an environmental permit. The Local Plan should highlight the need for developers to engage with Environment Agency at an early stage. Battery Energy Storage Systems (BESS) could potentially cause pollution of the water environment in the case of emergency situations, in particular fires. The Local Plan should highlight the need to assess risks to groundwater and ensure mitigation is in place for containment and consider whether BESS battery containers should be located away from vulnerable receptors. Policy DM9.3 - should include reference to designated Bathing Waters and adjacent Shellfish Water and strengthen wording on development that adversely affects surface and ground water quality. Policy DM9.4 - infiltration SuDS shall only be used where it can be demonstrated that they will not pose a risk to the water environment. They should not be constructed in contaminated ground where they have the potential to provide a pathway for pollutants.
Environment Agency	Infrastructure Delivery Plan	In regard to water quality and water resources, the cumulative impact of growth may dictate the type of new infrastructure that is required. For flood risk, the impact is likely to be different across locations, dependant on a range of factors such as the source of flooding, type of flood defences needed to provide protection and type of development proposed. Reference to SINCs should be changed to LWS (local wildlife sites), internationally designated sites should be listed. Refer to guidance for Cemeteries and burials; Protecting groundwater from human burials and Environment Agency's Approach to Groundwater Protection or successor document.

Historic England		
Historic England	General Comments	Historic England welcomes the emerging plan and work undertaken to date. HE strongly advises that the local authority conservation teams and archaeological advisors are closely involved throughout the preparation of the assessment of this Plan. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the Historic Environment Record (HER- formerly Sites and Monuments Record); how the proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.
Historic England	Strategic Policy Option – new neighbourhood	With regard to appreciation and setting of the Scheduled Monument known as Prittlewell Camp, a slight univallate hillfort located approximately 500 metres east of Sutton Road Crematorium (List Entry Number 1017515). Should the site be allocated for development, it is essential that proposals are designed to preserve key view lines to and from the Monument, especially its intervisibility with the Roach river valley to the north. Furthermore, the agreed 30 metre buffer zone to the immediate north of the Monument must be retained to help safeguard its significance and context. Policy should include a requirement for a Heritage Impact Assessment that assesses the significance of nearby heritage assets, with particular attention to the Scheduled Monument Appropriate mitigation may include limiting building densities and heights near the Scheduled Monument to safeguard its setting.
Historic England	Urban Design, Character and Heritage	Welcome Strategic Policy SP7, and in particular criterion 9 on Heritage, which acknowledges the significance of Southend's historic environment in shaping the city's identity and contributing to a strong sense of place. Welcome the inclusion of a policy framework for controlling building height in Southend-on-Sea, particularly the numerous references to the historic environment and our advice note on Tall Buildings and the Historic Environment. The supporting text should be amended to include a link to the relevant evidence document evidencing the locations deemed suitable for tall and large buildings in Policy DM7.3. Additionally, it would be helpful if the policy were accompanied by a plan illustrating the proposed locations. Support the inclusion of Policy DM7.6 and welcome its comprehensive approach to conserving and enhancing Southend's historic environment. We particularly welcome the emphasis on heritage-led regeneration, and the strong stance on deliberate neglect and the clear criteria for assessing harm to both designated and non-designated heritage assets. Taken together these measures provide a robust framework for managing change in a way that respects and celebrates the city's heritage.
Historic England	Neighbourhoods	Neighbourhood policies should identify designated heritage assets within/adjacent to the area and require a Heritage Impact Assessment to inform site design and ensure their significance and setting are appropriately conserved.

Natural England		
Natural England	Strategy, Objectives and Infrastructure	Welcome the plan's long term vision for a sustainable, healthy and inclusive city that has made Southend more resilient to a changing climate, incorporating high-quality infrastructure including green spaces. We welcome the strategic objectives, particularly strategic objectives 1, 10, 13 – 18, 21 which aim to deliver new and improved infrastructure to meet sustainable growth: protection and enhancement of the natural environment, including the coastal environment and marine biodiversity; improved quality and accessibility of green infrastructure; enhanced sustainable travel; and preventing and minimising the impacts of climate change. Policy SP1 – reference the Essex Local Nature Recovery Strategy and GBI should be in accordance with NE's Green Infrastructure Framework – Principals and Standards for England. Policy SP2 – Essex Coast RAMS review to be fed into the Local Plan including provision for Suitable Alternative Natural Greenspace (SANG).
Natural England	Strategic Policy Option – new neighbourhood	Natural England welcomes that this policy would require a Strategic Master Plan, setting out provision of strategic parkland and an integrated network of Green and Blue Infrastructure, including a new Country Park, landscaping and biodiversity measures having regard to the South Essex Green and Blue Infrastructure Study (SEE Park). Energy efficiency Net Zero carbon targets and requirements sustainable drainage solutions and at least 10% biodiversity net gain are also noted and welcomed. Given the number of new dwellings proposed for the new LNOS neighbourhood and its location within the Crouch and Roach SPA Zone of Influence (ZOI) for recreational disturbance, each of the new neighbourhoods will need to provide a Suitable Alternative Natural Greenspace (SANG) using the 8ha/1000 new population metric and ONS data of 2.4 people per dwelling and open to the public prior to first occupation the new dwellings. SANG standard greenspace can be incorporated within a Country Park or provided as part of wider green and blue infrastructure, but the specific requirements to meet NE SANG Guidelines (2021) (Guidelines for Creation of Suitable Alternative Natural Greenspace (SANG) - August 2021) will need to be met. Provision of SANG for each phase would require the LNOS promoters to alter the phasing plans in their Proof of Concept document to show how a SANG standard greenspace would be provided prior to first occupation of each phase / neighbourhood.
Natural England	Economy and Tourism	Whilst there may be a need as a tourist destination for development of facilities etc. to ensure there is capacity, Natural England is concerned that in some locations, increased recreational pressure may have significant impacts to both national and internationally designated sites. The policy should encourage relevant developments to identify opportunities to enhance connections between people and nature by identifying opportunities for engagement, and interpretation, such as promoting Bird Aware Essex. Proposals should demonstrate how they will promote responsible behaviour and support the long-term coexistence of people and nature, ensuring both can thrive within the locality - making reference to the Essex Local Nature Recovery

		Strategy. We note Permission will not normally be granted for proposals involving loss of existing employment land unless other enhancements will be delivered including significant enhancement of the environment. Whilst Natural England welcomes this, we believe the policy should include stronger requirements for all development to protect and enhance the natural environment, where relevant.
Natural England	Urban Design, Character and Heritage	We support the thrust of Policy DM7.1 in promoting opportunities for active and sustainable travel, inclusion of nature-based solutions to assist in mitigating the impacts of climate change and flood risk and contribution to local biodiversity, within development design and the public realm. We welcome embedded requirements to protect areas of ecological value through development on land that constitutes backland and/ or infill development (Policy DM7.2)
Natural England	Environment	Policy SP8 - We are pleased that the green and blue infrastructure network in Southend will be protected and strengthened, contributing to the development of the Nature Recovery Network for Essex, and providing multiple co-benefits for people and the environment including protecting and enhancing national and internationally important sites for nature conservation, securing biodiversity net gain, climate change resilience and supporting opportunities to provide a new country park on the northern edge of Southend. The Essex LNRS will be a key reference point in directing BNG to the places where it has the most impact for people and nature in Southend. SANGs should be provided in addition to RAMS tariff. Green Belt - Given constraints, we agree with the need for an infrastructure-led Plan. Natural England will be pleased to provide the Council with further advice and support on Green Infrastructure. Given that the Plan is infrastructure-led, new developments should ensure that they provide enough high-quality greenspace to meet people's needs. This will be particularly important in areas where greenspace deficits have been identified. Green Infrastructure requirements outlined in the Local Plan should also be referenced in the local Design Codes. Welcome the inclusion of an Urban Greening Factor policy in the Local Plan - Option1 would be an appropriate target for the UGF. Applying the UGF city-wide for all major developments would help to address deficits in accessible greenspace and nature across Southend and contribute to your ambitions for a 'green and sustainable' City. We have produced a calculator tool to help applicants assess their UGF scores for a scheme that could be referenced in supporting text. Southend Foreshore - welcome the policy aims for development to maintain and improve the integrity of designated habitats of nationally and internationally designated sites and minimise impacts on the biodiversity of the coastal and marine environment. Requirements for HRA and consideration of the South East Marine Plan, for relevant development, are supported. We welcome that all development on the coast must have regard to the need to manage future flood risk and coastal change to maintain the structural integrity of flood defences, including protection

		of sites of International, European, and national importance for nature, limiting any adverse impacts and where possible enhancing their biodiversity interest. Trees - support this policy which aligns with Natural England's Urban Tree Standard. Measures delivered through this policy (e.g. new street trees and increased canopy cover) will contribute towards the Plan's urban greening aims and deliver a range of benefits (e.g. mitigating heat stress). We recommend an overarching soils policy to require that wider development seeks to minimise the loss of best and most versatile agricultural land where possible. The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpins our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver. The plan should safeguard the long-term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future in line with National Planning Policy Framework paragraph 187.
Natural England	Climate Change	Policy SP9 – support policy to ensure Southend is more resilient to the impacts of climate change. We welcome net zero carbon aspirations referenced elsewhere in the Plan. It would be beneficial to see direct reference to Natural England's Green Infrastructure Framework and recognition of Green Infrastructure's role in strengthening climate change resilience. Policies should set out appropriate nature-based solutions for climate mitigation and adaptation such as woodland or wetland creation or peatland restoration. Pleased to see that the need for careful management of water resources including water efficiency measures, nature-based sustainable drainage solutions and strengthening the green and blue infrastructure network, are recognised as key environmental protection measures. Local plan should include the tighter water efficiency standards in Shared Standards for Water Efficiency in Local Plans (produced by Anglian Water, Cambridge Water, Essex & Suffolk Water, Affinity Water, the Environment Agency and Natural England, with the full endorsement of Water Resources East (WRE) as part of strengthening the Regional Water Resources Plan for Eastern England.
Natural England	Transport	SP10 - Support the aims of this strategic policy and associated development management policies to deliver sustainable transport through enhancements to cycling, walking and public transport infrastructure.
Natural England	London Southend Airport	SP11 - Pleased that proposals for development will only be supported where they fully assess the impacts of any increase in Air Transport Movements on surrounding occupiers and/or the local environment (in terms of noise, disturbance, air quality flooding, waste management, water management, ecological and climate change impacts).
Natural England	Infrastructure Delivery Plan	We welcome that the Council will review the Southend Community Infrastructure Levy (CIL) to provide for infrastructure contributions that deliver both strategic and local infrastructure

		improvements. The review of the CIL provides an opportunity for Southend LPA to provide a strategic (LPA-owned) SANG via new Country Parks that meets the NE SANG Guidelines (2021) standard (Guidelines for Creation of Suitable Alternative Natural Greenspace (SANG) - August 2021). Natural England suggests a minimum provision of 3ha of accessible greenspace per 1000 population, and we welcome the reference to this Standard in your Infrastructure Delivery Plan. Where new development will exceed the capacity of sewage treatment works, required upgrades / improvements should be in place before first occupation.
National Highways		
National Highways	Transport	We have reviewed the policies and allocations that are being consulted upon in your 'Preferred Approach with Options Regulation 18 consultation' and are satisfied none of these will directly affect the SRN, however National Highways recognises the emphasis made surrounding the importance of better public transport, providing pedestrian and cycle facilities and improved access and connectivity. No sections of the Strategic Road Network (SRN) run directly through or in close proximity to Southend, however, there remains the potential that significant future growth could impact on SRN junctions further west along the A13 and A127 close to the M25. The majority of our junctions in these areas experience significant pressures at peak times, and this will likely be exacerbated by future traffic growth. We have a particular interest in any allocation or policy that could have adverse road safety or operational implications for the SRN. The latter would include a material increase in queueing or delay, or a reduction in journey time reliability during the construction or operational stages of the development included in the Local Plan. We also welcome and encourage the incorporation of active travel and sustainable transport policies and will be supportive of any policies which seek to off-set strategic car journeys that would otherwise travel on the SRN.
National Highways	Infrastructure	We have reviewed the draft Infrastructure Delivery Plan documents supplied and have no comments to make on these. It should be ensured that for the larger developments in Southend, Transport Assessments, comprising an assessment of the impact on the SRN, be submitted alongside planning applications when these come forwards.
Network Rail		
Network Rail	General Comments	NR welcomes the recognition and support for enhancements to railway infrastructure and public transport provision within the proposed Local Plan, particularly in relation to Southend Central and Southend Victoria stations. We look forward to working in close collaboration with Southend-on-Sea City Council (SCC) to ensure that the necessary rail infrastructure improvements can be effectively delivered in support of the Plan's objectives.

Network Rail	Vision, Strategy and Infrastructure	Policy SP2 - Network Rail recognises that rail infrastructure and accessibility will play a vital role in supporting these objectives. We welcome the policy's specific reference to Southend Central and Southend Victoria stations as strategic transport interchanges. To ensure the successful delivery of the required station improvements, it will be essential for SCC to work in close partnership with NR, c2c, and Greater Anglia. This collaboration should also extend to other stations within the Southend to ensure a cohesive and future-proofed transport network. Policy SP3 - NR welcomes the inclusion of mechanisms within Policy SP3 that support the funding and delivery of essential improvements to the railway network and stations, which will be critical in accommodating the proposed level of growth across Southend. We particularly support the provisions set out in parts 3, 4, and 5 of the policy, which, alongside the Infrastructure Delivery Plan (IDP), will be instrumental in securing the necessary infrastructure investment.
Network Rail	Transport	Policy SP10 - NR supports the ambition to deliver a modern, integrated transport system that underpins sustainable growth through an infrastructure-led approach. We welcome SCC's commitment to enhancing connectivity and look forward to continued engagement to help realise this vision. It will be essential that new development contributes appropriately to the enhancement of railway infrastructure and station facilities. Furthermore, the implementation of robust Travel Plans will be critical in promoting seamless integration between transport modes and encouraging sustainable travel choices across Southend.
NHS Integrated Care Board		
NHS Mid and South Essex Integrated Care Board (ICB)	Vision, Strategy and Infrastructure	Vision should be amended to state that people will be living healthier lives and that health inequalities will have reduced. Strategic Objective 1 should be amended by replacing "to meet sustainable growth" with "to achieve sustainable growth and reduce existing infrastructure deficits". Strategic Objective 2 should be amended, or supporting text added, to describe "complete neighbourhoods", including recognition that neighbourhoods of less than 10,000 will not necessarily include a GP surgery and investment may include contributions towards at scale neighbourhood health centres covering a larger population. Strategic Objective 3 should be amended, or a new objective included to improve population health and reduce health inequalities in Southend. Strategic Objective 4 should be amended to include provision of new facilities and broadening access to facilities. Figure 3.1 Southend City at a Glance provides a useful summary about the city but does not include any information about healthcare. Whilst the ICB recognises that there is opportunity for significant numbers of new homes in the city, it is concerned that without significant contribution from developers, there will be significant strain put on GP practices in this area. Given the pre- existing inequalities faced by these communities, there is a real risk of the new homes in the city centre could exacerbate inequality further in direct conflict to the Council's strategic objectives. The ICB considers that land to the north of Southend may offer opportunities to provide new healthcare infrastructure

		including services currently located on the Southend Hospital site to relieve existing pressures and or accommodate 'left shift' of health services in line with the government's 10 Year Plan. Support policy SP4. Object to the wording of DM4.1.ii and suggests amendment to allow healthcare infrastructure to be rationalised, including the closure of facilities, in response to changing models of care and or estate availability/viability without the requirement to satisfy the Council.
NHS Mid and South Essex Integrated Care Board	Retail and town centres	ICB requests Healthcare uses be included as potential uses in the city centre, neighbourhood centres and local centres.
NHS Mid and South Essex Integrated Care Board	Environment	Trees – policy supported because the presence of trees contributes to improving the quality of the environment which is beneficial to health and wellbeing. Flood Risk - Care homes are not permitted in Flood Zone 2 or 3 areas unless effective flood proofing and evacuation plans which do not rely on emergency services are in place.
NHS Mid and South Essex Integrated Care Board	Transport	The ICB supports policy DM10.1 because its provisions are designed to encourage more cycling and walking and physical activity makes a significant contribution to improving health and wellbeing. The ICB supports policy DM10.2 because it will encourage effective traffic management, the use of alternative means of transport and so support emergency vehicles reaching destinations more quickly.
NHS Mid and South Essex Integrated Care Board	Neighbourhoods	The ICB is concerned about the additional pressure that development will place on already constrained healthcare infrastructure. Specific infrastructure comments are provided for each neighbourhood.
NHS Mid and South Essex Integrated Care Board	Infrastructure	The ICB notes the list of infrastructure requirements set out in Appendix 4. The ICB requests ongoing engagement with the Council to review and adjust these requirements as the scale and location of planned development develops.
Marine Management Organisation		
Marine Management Organisation	Environment	Welcome the inclusion of reference to the South East Marine Plan. We would also recommend a reference to the requirement of a marine licence for certain activities carried out within the UK marine area (as outlined in the Marine Licensing section above) within this section. We would recommend you use the south east marine plan policies as evidence to support your local plan's preferred approach and options.
Marine Management Organisation	Climate	Advise that the Climate Change and Sustainable Design chapter incorporate the marine plan policies on flood defence, carbon sequestration habitats and climate change resilience (e.g., SE-CC-1, SE-CC-2, SE-C-3) to address marine related climate impacts.
Sport England		
Sport England	Strategic Objectives	Support is offered for the proposed vision particularly in terms of growing a sustainable, healthy and inclusive city as this would support opportunities for sport and physical activity for the

		community and encourage active and healthier lifestyles. Specific support is offered for strategic objectives 2, 4, 16 and 17 especially in relation to delivering healthy neighbourhoods, promoting/protecting sports facilities and improving the quality and accessibility of green space. These objectives would accord with Government policy in paragraph 96(c) of the NPPF and Sport England's 'Uniting the Movement' Strategy.
Sport England	Vision, Strategy and Infrastructure	SP1 - The spatial principles are supported especially i, v, viii and xiii as they would all support the creation of active environments that would contribute to delivering the Local Plan's wider vision and strategic objectives as well as meeting the NPPF and Sport England's Uniting the Movement' Strategy. SP3 - This policy is broadly supported but it is requested that part 2(v) be amended to refer to green space, sport and recreation enhancement and provision. This would be consistent with the scope of paragraph 3.16 of the reasoned justification and policy DM4.2 and help avoid potential interpretations when applying the policy that indoor/outdoor sport is not covered by 'green space' or 'recreation'.
Sport England	Strategic Policy Option – new neighbourhood	The policy option would involve the loss of Garon Park Golf Complex which consists of three 9-hole golf courses, a par Option three 9 hole course for beginners and a floodlit driving range. In the context of the Council's evidence base on golf facility needs, Sport England is concerned that the impact of a new neighbourhood on golf facility provision has not been identified or considered in the consultation document. Without prejudice to our position on the loss of golf facilities, if the new neighbourhood is included in the Regulation 19 pre-submission plan, the guiding principles and expectations would be expected to include the following: • The preparation of a sport and recreation strategy to inform a strategic approach to community sport and recreation provision in the new neighbourhood that could inform the Strategic Masterplan and any SPDs. Such a strategy would consider the sport and recreation needs of the development and inform whether they should be met by onsite or off-site provision and consider the scale and form of on-site provision. • The development requirements should require that the development is designed to maximise opportunities for creating healthy and active lifestyles. This would be consistent with the Local Plan's vision, strategic objectives and relevant policies such as DM7.1.
Sport England	Enabling Healthy Lifestyles	The policy is broadly supported as it seeks to enable healthy lifestyles that would include encouraging physical activity by a range of measures. However, it is requested that an additional policy requirement is included which explicitly requires new development to be planned and designed to encourage physical activity. Paragraph 4.3 of the reasoned justification refers to using active environment design and spatial planning principles to support healthy lifestyles but this could be made more explicit in the policy itself. The reasoned justification could also support this

		by signposting to Sport England's Active Design guidance for detailed advice on how developments can deliver this in practice. Policy DM4.2 -The policy is supported in principle as it seeks to protect existing sports facilities, secure additional facilities where new development would create or add to deficiencies and supports proposals for improvements to specific sports facility types for which there is a need such as swimming pools and golf courses. It is requested that part 1 of the policy 'supports' the principle of new or replacement sport/recreation facilities or extension to existing facilities where a need has been identified for them.
Sport England	Design and Heritage	SP7 Part 1 (iv) of the policy is supported as it requires developments to incorporate inclusive and active design. This would be consistent with Government policy in paragraphs 96 and 129 of the NPPF and Sport England's Active Design guidance. It would also be consistent with the vision, strategic objectives and other relevant policies of the plan such as SP1 and SP4. To support the delivery of this policy in practice it is requested that the reasoned justification signposts to Sport England's Active Design. DM7.1 Part 1(iv) and part 2 of the policy are supported as it expects developments to prioritise active travel through the layout of developments and creating safe and accessible routes and through designing the public realm to create active environments. To support the delivery of the policy in practice it is requested that that reasoned justification to the policy signposts to the Active Design guidance as this provides practical guidance on how the layout of developments and the design of the public realm can contribute towards creating active environments.
Sport England	Environment	It is noted that the Council will be providing further detailed guidance on BNG. It is requested that when preparing such guidance that consideration is given to Sport England's BNG guidance as this provides detailed advice about how habitat creation or enhancement can be designed so that it is compatible with outdoor sports use. It is noted that paragraph 8.57 of the reasoned justification has identified this issue which is welcomed. The reasoned justification could also signpost to this guidance to assist with the implementation of the policy. SP8 While this policy is broadly supported it is requested that it be enhanced by the inclusion in part 4 of another priority for Southend's green and blue infrastructure along the lines of 'protect, enhance and provide opportunities for sport and physical activity'. DM8.2 This policy is supported especially parts 1, 2, 3, 6, 7 and 8 as these requirements would collectively make provision for the protection, enhancement and provision of public open space which provides one of the principal opportunities for the city's residents to be physically active.
Sport England	Climate Change	SP9 - The policy is supported especially criteria 2(ii) and 2(iv) as they support walkable neighbourhoods and improving opportunities for active travel. This contributes to improving physical activity opportunities as well as responding to climate change and therefore helps achieve multiple objectives of the Local Plan. Sport England's Uniting the Movement strategy

		recognises that Sport England has a contribution to make to tackling climate change by influencing how people live and travel and our Every Move strategy provides further guidance. DM9.3 - Part 7 of this policy is broadly supported as it provides for a balanced approach to address the impacts of development that either generate noise or are sensitive noise which include outdoor sports facilities. As sports facilities such as artificial grass pitches, multi-use games areas, tennis/padel courts etc are common facilities that may be impacted by noise sensitive developments like residential uses it is requested that the list of examples at the end of section 7 includes reference to sports facilities as well as industrial uses, public houses and music venues.
Sport England	Transport	SP10 - The policy is supported due to its focus on supporting sustainable and active travel modes which will encourage physical activity. The policy would accord with Government policy in paragraph 96(c) of the NPPF and Sport England's 'Uniting the Movement' Strategy. DM10.1 - While the policy is broadly supported due to part 1 focusing on development being located to encourage walking and cycling it is requested that part 1 of the policy include an additional requirement to co-locate community facilities wherever possible in major developments in order to reduce the need to travel and to encourage the use of active travel modes.
Sport England	Neighbourhoods	• Prittlewell - support the allocation of the Roots Hall Stadium site for a modern community stadium, as it aligns with Southend United FC's aspirations. • Fossetts - objection is made to the proposal to allocate Fossetts Farm (HEA264) for mixed use residential development without a policy making provision for appropriate mitigation to be secured for the impact on playing field provision. While acknowledging that there is an extant planning permission for redevelopment of the site, this planning permission made provision for the mitigation of the impact of the development on three separate playing fields within the site that would be affected by this development. The site also includes the Cecil Jones Academy's detached playing fields that were used by the Academy and the wider community until they closed around 10 years ago. While the site may not be currently in use as a playing field and has not been many years, Sport England considers proposals for the development of such sites in the same way as playing fields that are in active use because development on them would permanently prevent such sites from being brought back into use. While this playing field may not be in active use at present, it may be required for meeting current or future community playing pitch needs. • Fossetts - Garon Park (including Southend Leisure & Tennis Centre) is a strategic indoor and outdoor sports facility site that offers important facilities that serve the whole city. There is a current planning application that is being determined for providing additional outdoor sports facilities at the site that is intended to help address needs identified in the Council's Playing Pitch Strategy. Given the strategic importance of the site it is requested that the Council gives consideration to identifying the site for community sports provision. As well as protecting the

		site for meeting current and future community sports facility needs, a policy could also support the principle of proposals for new or enhanced sports facility provision on the site which address identified needs. Such a policy approach would be considered to accord with paragraph 103 of the NPPF and the Council's current and emerging evidence base. • Shoeburyness - Object to the proposal to allocate Land at Elm Road in Shoeburyness (HEA137) for a new school residential development. Aerial photographs (Google Earth Pro) indicate that the site was used as a playing field up until around 2010 and had several football pitches marked out on it. While the site may not be currently in use as a playing field and appears not to have been in use for many years, Sport England considers proposals for the development of such sites in the same way as playing fields that are in active use because development on them would permanently prevent such sites from being brought back into use. Potential may exist for a potential objection to be addressed in accordance with paragraph 104 of the NPPF and Sport England's playing fields policy if the playing fields were acceptably replaced as a requirement of the site allocation policy and a related site allocation was made through the Local Plan for a replacement playing field site. Alternatively, on this occasion, mitigation in the form of an appropriate financial contribution being secured towards new or enhanced off-site community playing field provision in accordance with priorities identified on the Council's Playing Pitch Strategy would be acceptable in principle.
Other consultees		
Anglian Water		
Anglian Water	Vision, Strategy and Infrastructure	SO15 - water efficiency should be included to align with policies SP9 and DM9.1. Policy SP3 – support the policy and agrees that infrastructure capacity is provided in an appropriate and timely way. It is noted that the supporting text identifies that utilities (including sewerage and storm water drainage) and flood risk are types of infrastructure provision and elements require updating, including parts of the sewer network. Anglian Water has been proactively working with the City Council and wider stakeholders to address and manage flood risk in the city for a number of years. Our flood partnership work and involvement in the Catchment to Coast programme, demonstrate our commitment to resolving issues arising from surface water runoff and sewer surcharging in the city. Southend is specifically targeted for spills reduction in a new and innovative programme: A-WINEP Spill Reduction Programme.
Anglian Water	Strategic Policy Option - new neighbourhood	Anglian Water recognises that a significant number of homes could be built on greenbelt land to the north of the city. Whilst we do not have a specific view on the principle of whether new homes should be developed on the greenbelt, we would agree that the provision of a green and blue

		infrastructure network is essential, and SuDS should be included as part of this multi-functional provision. Given the strategic scale of the proposed development the opportunity to provide overall betterment in terms of mitigating flood risk should be incorporated, depending on flow paths and existing areas at risk of surface water flooding - including cross-boundary considerations. The new neighbourhood should be innovative and achieve the highest standards of integrated water management including water reuse (through rainwater harvesting and/or greywater recycling) as this reduces the pressure on existing drainage/sewerage networks and increases resilience to climate change. Surface water run-off mitigation measures should follow the drainage hierarchy with the preference for SuDS and water reuse. In terms of wastewater infrastructure, developers should seek early engagement with Anglian Water regarding advice on a sustainable point of connection to the foul drainage network, given the quantum of development proposed, which may require network reinforcement to accommodate wastewater flows. Anglian Water's investment programmes are set every 5 years, so it is important that strategic sites are clear in their infrastructure needs and are engaging with Anglian Water to assess these requirements, to avoid delays further down the line.
Anglian Water	Homes	It is of critical importance that new homes make the best use of integrated water management measures to reduce surface water flood risk to new and existing communities and contribute to overall improvement to surface water management across the city, in accordance with draft Strategic Policy SP3, to ensure growth is infrastructure-led. The SFRA Level 1 requires updating to align with more recent flood risk data, or updates to flood data (NaFRA2) are referred to in the SFRA Level 2 when assessing flood risk against the proposed site allocations (including broad locations/opportunity sites) for future growth within and adjoining the city.
Anglian Water	Economy and tourism	Stock Road employment area is identified as an employment growth area and includes our water recycling centre (WRC) for Southend - which treats wastewater for the whole of the city, and some of the surrounding local planning authority areas. We would agree on the retention of this area for employment, to avoid sensitive receptors (residential development) being introduced into an area that could have amenity impacts through odour and noise, owing to the operation of our site.
Anglian Water	Urban Design and Heritage	Welcome the specific design policy for the public realm that utilise nature-based solutions to assist in mitigating the impacts of climate change and flood risk in Southend. We aim to work in partnership with the Council and other stakeholders to introduce a green infrastructure-led approach to managing surface water run-off through our flood partnership work, and A-WINEP programme.

Anglian Water	Environment	DM8.2 – supporting text should clarify that SuDS are part of the green infrastructure network. DM8.3 – support urban greening factor which should be applied to major developments on a city-wide basis to contribute to wider objectives of the local plan Policy SP9 – AW does not support the water efficiency standard of 110 litres per person per day (l/p/d), recommend the Council introduces tighter water efficiency standards that can help make development across the city more water efficient and allow sustainable growth, whilst longer term water supply solutions are being developed/implemented. Shared Standards for Water Efficiency in Local Plans indicates that a design standard of up to 85 litres/person/day (l/p/d) for residential developments is feasible (a range between 85-95 l/p/d should be considered subject to viability), and new, extended or redevelopment non-residential development should achieve full credits in the BREEAM water calculator. Policy DM9.3 - should be amended: "Developments that adversely affect surface and ground water quality will be resisted. Proposals should include measures to reduce risks to the water environment and its ecology; aim to improve water quality (surface, ground and the sea) and ensure that new development does not unduly burden the existing foul water system demonstrates there is capacity in the sewerage network and receiving water recycling centre to accommodate wastewater flows". The developer is responsible for providing the appropriate surface water disposal infrastructure. As such, all the work to determine the feasibility of a connection to the existing surface water sewer complete with all upgrades to the consented outfall is to be carried out by the developer at their cost. Anglian Water will request a planning condition to ensure no additional flow will be connected until any identified upgrades have been delivered and sufficient capacity in the network has been demonstrated. Policy DM9.4 - welcome the approach to ensure that all development proposals should demonstrate how they incorporate SuDS to mitigate the increase in surface water run-off, and work with natural processes to use green infrastructure solutions to flood risk management. However Anglian Water proposes that the clause 2 is amended to state:...Under no circumstances will surface water be permitted to discharge into a separate foul sewer or to a combined sewerage system via a new connection. All surface and foul water flows should be separated. Surface water run-off must follow the drainage hierarchy and where it cannot be discharged into the ground, or to a surface water body then discharge must be to a surface water sewer or local highway drain subject to approval by the organisation responsible for these drainage networks.
Anglian Water	Neighbourhoods	Anglian Water is generally supportive of the place-specific neighbourhood policies, which cross reference some of the key policies in the plan which are particularly relevant for each neighbourhood, including managing flood risk and protecting and enhancing green and blue infrastructure, including SuDS provision. Development proposals should be in accordance with all relevant policies in the Local Plan, and therefore, we consider the neighbourhood policies will be

		consistent with all other policy requirements. Can the Council clarify that the allocation of sites for development means that the sites have been assessed through a Level 2 SFRA as suitable for development? We consider that it would be simpler for these policies to state: Development should seek to avoid the risk of flooding and incorporate sustainable drainage systems (SuDS) (Policy DM9.4). Fossetts includes the Stock Road employment area where the Southend WRC is located. Anglian Water recommends that reference is made to the 'Agent of Change' principle regarding the proximity of the proposed site allocation HEA264 to our WRC to avoid sensitive receptors such as residential development being impacted by odour or noise. We suggest the policy includes the following criterion: Achieving mixed use development which has regard to the protection of nearby industrial users with reference to the Agent of Change Principle (Policy DM9.3).
Essex and Suffolk Water		
Essex and Suffolk Water	General Comments	We welcome the overall content and vision of the Local Plan and commend the Council on reaching this detailed stage.
Essex and Suffolk Water	Vision, Strategy and Infrastructure	SO15 – water efficiency should be added to read: "prevent or minimise the impact of climate change, including for air quality and flood risk and improve water efficiency and energy efficiency". We support Strategic Policy SP1: Spatial Principles and SP3 Securing and Improving Infrastructure which pursues an infrastructure led approach to the plan implementation, especially the Policy SP3 that seeks to ensure that individual or cumulative new development does not have a negative impact on existing infrastructure, especially where it is operating at or close to capacity.
Essex and Suffolk Water	Homes	We note that the Council intends that housing will be phased so a greater proportion of homes are delivered in the latter half of the plan period. For us to support housing provision it will be imperative that we work very closely, in co-operation and collaboration with both planners and developers to fully understand each development's water needs.
Essex and Suffolk Water	Strategic Policy Option - new neighbourhood	Policy Option 3b asks the question of whether to develop a new neighbourhood on land to the north of Southend. This is an option to accommodate a further 4,000 to 5,000 dwellings by 2040 as well as employment floor space, new parkland and associated infrastructure and services. This would be implemented through a strategic master plan, and we propose that ESW is a partner in the early stages of the plan to provide a realistic water supply infrastructure programme.
Essex and Suffolk Water	Infrastructure Delivery Plan	As part of the evidence for your local plan, ESW has identified infrastructure improvements that will be needed to accommodate the proposed levels of growth across our operating area. These improvements include mains rehabilitation works, water main reinforcements and duplications to ensure supply is maintained. We strongly encourage the submission of pre-planning enquiries to ESW as this will support efficient and effective planning. Please be aware that ESW water supply area boundaries will not necessarily align with that of any council's and the positioning and volume requirements of any connection new to our water network will impact on the costs

		associated. Similarly, the timing of any council's planning is unlikely to coincide with the timing of our own business planning, and we must be considerate of all our regulators.
Essex and Suffolk Water	Economy and Tourism	We are fully committed to supporting economic growth across the region and in Southend on-Sea City Council's Area, and to continue to invest in infrastructure enhancements to improve water distribution. However, it is important to note that, unlike domestic supplies, we are not under a statutory obligation to provide these services to commercial users and may be unable to immediately do so if the new water requirement is greater than the residual capacity in our network. We are currently updating our policy position on large non-household developments requiring significant mains water for non-domestic use including but not limited to, data centres, giga factories and hydrogen production plants. We strongly encourage the submission of pre-planning enquiries to ESW for us to ascertain the water supply needs, and to plan to supply the necessary infrastructure within timeframes.
Essex and Suffolk Water	Environment	LPAs can help ensure the risk of harm to habitats and deterioration to water bodies due to water scarcity is minimised by setting more ambitious, tighter water efficiency standards for new residential and non-domestic developments in local planning policy. At present it is feasible to achieve a total consumption of 85 l/p/d by taking a fittings-based approach using product types outlined in the Shared Standards Annex C - Section C2, which can be achieved at relatively low cost (Shared Standards for Water Efficiency in Local Plans). New, extended or redevelopment non-residential development should achieve full credits in the BREEAM water calculator.
Essex Fire and Rescue		
Essex Fire and Rescue	General	Specific policy and supporting text changes requested to ensure the draft Local Plan attributes appropriate recognition and a higher profile to the important role played by these Essex County Fire and Rescue and its Blue Light Partners - in contributing to the creation of safe, cohesive, strong, healthy, vibrant and resilient new communities (including reference within Policy SP3, Strategic Option for new neighbourhood, Policy SP4, Policy DM4.1 and place specific neighbourhood policies).
Essex Police		
Essex Police	General Comments / Housing/Design/ Economy and Tourism	Recommend inclusion of the word 'safe' within policies SP1 - 3 and Spatial Principles. SP4, Policy DM4.2 and Policy DM6.4 – include reference to reducing violence against women and girls when designing new and adapting public realm and green spaces. SP5, DM5.5, DM5.6, DM7.3 and DM7.5 – include reference to reducing crime and ASB. DOCO would like to bring to your attention the Essex HMO Amenity Standard (2018) (essex-hmo-amenity-standards). The document sets out standards for developers to design good quality HMOs of which incorporates security. DM5.8 - Due to the possible vulnerability of the residents, it is advised that there is engagement with the DOCO to ensure all supported accommodation is

		designed to be safe and secure. This will also support sustainability and health and wellbeing objectives and align with Policy DM7.1.
Essex Police	Transport	Advocate the implementation of a "Safe system approach" when designing local road infrastructure. Furthermore, it is recommended that there is consultation with the Essex Police Roads Policing team to ensure that Emergency Services can have a response throughout Southend. It is essential that all new developments should take into consideration the use of emergency vehicles and how they access sites in a safe manner. Furthermore, it is vital that Traffic Management Strategies consider any enforcement required such as parking enforcement and low speed limits, and that they are self-policing and enforceable.
Essex Police	Climate Change	From a residential perspective, it is recommended there are discussions with Essex Police to discuss management practices of shared EV charging points e.g. flats and car ports this will support in prevent crime and neighbour disputes. It is essential that heat pumps are not fitted in a position which would allow access into properties. It is advised that additional security provisions are implemented within the design (especially within commercial settings) to prevent heat pumps being targeted as the units contain valuable materials (such as copper) and nationally there is a rise in crime associated with the theft of these materials.
Essex Police	Neighbourhoods	Specific comments on neighbourhood hood policies and site allocations related to site access, walking and cycling routes, lighting, landscaping and public realm.
Essex Wildlife Trust		
Essex Wildlife Trust	Environment	Policies to be strengthened by inclusion of Local Wildlife Sites, reference to Irreplaceable Habitats, application of the ecological mitigation hierarchy, Habitat Regulations Assessment requirements, being more specific about BNG delivery and alignment with Local Nature Recovery Strategy. New policy requiring protection of habitats and species of principal importance is requested, including requirements to undertake ecological assessments. Urban Greening Factor - prioritises quantity of greening over ecological quality. Policy must also ensure UGF proposals demonstrate contribution to BNG delivery and LNRS objectives and include reference to long term management requirements. Should also apply to 'larger' minor developments and encourage urban greening on minor developments. Trees – tree planting standards required covering species selection, planting specifications and long-term viability. Seafront Character Zones should prioritise ecological sensitivity with spatial strategy for maintaining undisturbed refuges. BNG policy should establish a spatial hierarchy for delivery of BNG
Forestry Commission		
Forestry Commission	Environment	Add policy reference to irreplaceable habitats (including veteran trees and ancient woodland).

Forestry Commission	Climate Change	Timber could be referred to as an example of sustainable construction materials under Policy DM9.1

End of document