

APPENDIX 1 TO CMA ECC RESPONSE TO SOUTHEND LOCAL PLAN ISSUES AND OPTIONS (REGULATION 18), FEBRUARY 2019

1. INTRODUCTION

Thank you for seeking Essex County Council (ECC) comments on the Southend Local Plan Issues and Options Consultation and the supporting Integrated Sustainability Appraisal (SA). The following is ECC's response covering matters relevant to ECC as a neighbouring authority. The response does not cover ECC as a landowner and/or prospective developer. A separate response will be made on these matters (if relevant) and that response should be treated in the same way as a response from other developers and/or landholders.

ECC supports the preparation of a new Local Plan for Southend-on-Sea Borough Council (SBC) and will assist on strategic and cross-boundary matters under the duty to cooperate, including engagement and co-operation with other organisations for which those issues may have relevance. This will ensure SBC, in consultation with ECC, can plan and provide the necessary cross boundary infrastructure and services; whilst securing necessary funding.

2. ECC INTEREST IN THE ISSUES CONSULTATION

ECC aims to ensure that local policies and related strategies provide the greatest benefit to deliver a buoyant economy for the existing and future population that lives, works, visits and invests in Essex. This includes a balance of land uses to create great places for people and businesses; and that the developer funding for the required infrastructure is clear and explicit. As a result, ECC is keen to understand, inform, support and help refine the formulation of the development strategy and policies delivered by LPAs within and adjoining Essex, including the preparation of South Essex statutory Joint Strategic Plan (JSP). Involvement is necessary and beneficial because of ECC's role as:

- a. a key partner of ASELA and Opportunity South Essex Partnership (OSE), promoting economic development, regeneration, infrastructure delivery and new development throughout the County;
- b. major provider and commissioner of a wide range of local government services throughout the administrative county (and where potential cross boundary impacts need to be considered);
- c. a highway and transport authority, including responsibility for the delivery of the Essex Local Transport Plan; Local Education Authority including Early Years and Childcare (EYCC), Special Education Needs & Disabilities, and Post 16 education; Minerals and Waste Planning Authority; Lead Local Flood Authority; lead advisors on public health; and adult social care in relation to the securing the right housing mix which takes account of the housing needs of older people and adults with disabilities, all for the administrative county of Essex, and;
- d. an infrastructure funding partner, that seeks to ensure that the development allocations proposed are realistic and do not place an unnecessary (or unacceptable) cost burden on the public purse, and specifically ECC's Capital Programme.

3. DUTY TO CO-OPERATE

The duty to cooperate (the Duty) was introduced by the Localism Act in November 2011. The Act inserted a new Section 33A into the Planning and Compulsory Purchase Act

2004. This placed a legal duty on all local authorities and public bodies (defined in regulations) to 'engage constructively, actively and on an ongoing basis' to maximise the effectiveness of local and marine plan preparation relating to strategic cross boundary matters, and in particular with County Councils on strategic matters.

The National Planning Policy Framework (NPPF, February 2019) provides detail on how strategic planning matters should be addressed in local plans (paragraphs 20 to 27). Local planning authorities are expected to work 'collaboratively with other bodies to ensure that strategic priorities across local authority boundaries are properly coordinated and clearly reflected in local plans.

Specific guidance on how the Duty should be applied is included in the Planning Practice Guidance (the PPG). This makes it clear that the Duty requires a proactive, ongoing and focussed approach to strategic matters. Constructive cooperation must be an integral part of plan preparation and result in clear policy outcomes which can be demonstrated through the examination process.

ECC anticipate that SBC will comply with the Duty and actively engage ECC as a key partner on strategic and cross-boundary matters, including engagement and co-operation with other organisations for which those issues may have relevance e.g. Highways England. In accordance with the Duty, ECC will assist SBC and contribute cooperatively to the preparation of a new Southend Local Plan,

ECC will contribute / cooperate with SBC with the preparation of the new Local Plan. This consultation is of relevance to ECC as both a neighbouring authority and a partner within ASELA which was formed to meet the legal requirements of the Duty to support the preparation of member authorities Local Plans. There are impacts for ECC, as a neighbouring authority given the extent to which ECC bounds the SBC administrative area, and the level of proposed growth on the delivery of our statutory functions and responsibility as highway authority (and the delivery of the Essex Local Transport Plan); local education authority; Minerals and Waste Planning Authority; Lead Local Flood Authority; Public Health advisor; as well as the ECC role as a major provider and commissioner of a wide range of local government services throughout the county of Essex, many of which are accessed by those who reside in adjoining authorities, such as residents in SBC.

ECC will assist SBC and contribute cooperatively to the preparation of a new Southend Local Plan, particularly within the following broad subject areas,

- ECC assets and services. Where relevant, advice on the current status of assets and services and the likely impact and implications of proposals in the emerging Local Plan for the future operation and delivery of ECC services.
- Evidence base. Assistance with assembly and interpretation of the evidence base for strategic/cross-boundary projects, for example, education provision and transport studies and modelling, and wider work across South Essex as part of the JSP.
- Sub-regional and broader context. Assistance with identification of relevant information and its fit with broader strategic initiatives, and assessments of how emerging proposals for Southend may impact on areas beyond and vice-versa.
- Policy development. Contributions on the relationship of the evidence base with the structure and content of emerging policies and proposals.

- Inter-relationship between Local Plans. Including the emerging South Essex Joint Strategic Plan (JSP) and the Essex Minerals Local Plan 2014 (MLP) and the Essex and Southend-on-Sea Waste Local Plan 2017 (WLP).

ECC Strategic context and strategies

A range of strategies produced solely by ECC or in collaboration with the Essex borough, city and district councils, and the Greater Essex unitary authorities Southend-on-Sea and Thurrock, provide the strategic context for our response to this consultation. These are listed within ECC's response to Question 1 (evidence) and expanded upon within Question 1.4 (Spatial Strategy).

SBC will need to ensure that ECC is actively engaged under the Duty to ensure that the full range of strategic and cross boundary issues are identified and appropriately addressed as part of the evidence base and where relevant, reflected in the new Local Plan itself.

4. ECC RESPONSE TO SOUTHEND LOCAL PLAN ISSUES AND OPTIONS REGULATION 18 CONSULTATION February 2019

ECC's response follows the format of the consultation document, with comments set against questions of relevance and interest to ECC.

ISSUE 1: OUR VISION & STRATEGY FOR THE FUTURE – INCLUDING THE OVERALL VISION FOR SOUTHEND AND STRATEGY FOR WHERE NEW DEVELOPMENT IS ALLOWED.

Question 1 What would you like Southend to be like in the future?

ECC supports the preparation of SBC's new Local Plan as we recognise the importance of providing leadership on where development should take place, rather than being led by development pressures. We welcome the references to the need for cross boundary working, the need for Duty and setting the new Local Plan within the framework of the JSP. ECC would expect the new Local Plan would be positively prepared and justified based on up to date robust evidence, including the new technical evidence where necessary to support the emerging spatial strategy and site allocations.

In accordance with the Localism Act 2011, ECC will contribute / cooperate with SBC with the preparation of the new Local Plan. This consultation is of relevance to ECC as both a neighbouring authority and a partner within ASELA which was formed to meet the Duty's legal requirements to support the preparation of member authorities Local Plans. There are impacts for ECC, as a neighbouring authority given the extent to which ECC bounds the SBC administrative area, and the level of proposed growth on the delivery of our statutory functions and responsibility as highway authority (and the delivery of the Essex Local Transport Plan); local education authority; Minerals and Waste Planning Authority; Lead Local Flood Authority; Public Health advisor; as well as the ECC role as a major provider and commissioner of a wide range of local government services throughout the county of Essex, many of which are accessed by those who reside in adjoining authorities, such as residents in SBC.

This consultation is the first opportunity for ECC to respond to SBC's Issues and Options and specifically the emerging spatial strategy options, in broad terms, which include the

option for a new cross boundary development (most likely in Rochford District) for a new large-scale GC whilst recognising the need for further detailed assessment and evidence post consultation. ECC is particularly interested in the following development areas/proposals:-

- A Southend urban extension on the Southend/ Essex boundary;
- A potential new cross boundary GC in Southend and Essex; and
- Strategic transport corridors including the potential options for an outer bypass / extension to the A127.

It is too early for ECC to provide specific and detailed spatial comments on the cross-boundary impact and opportunities for ECC infrastructure and services arising from this consultation either individually or cumulatively; and taking into account the emerging Local Plans for Rochford District and Castle Point Borough Councils. There is, however, a clear list of strategic cross boundary issues that need to be explored and progressed between SBC and ECC as plan preparation continues and ECC would expect to be engaged by SBC under the Duty to inform the development of SBC's preferred spatial strategy, supporting site allocations (including evidence), governance and delivery mechanisms/models (including legal and financial) following this round of consultation. This will then enable ECC to identify the individual and cumulative issues and opportunities for our services, especially if the preferred spatial strategy is for 'shared growth' in the neighbouring authority area of Rochford DC.

ECC would wish to become much more actively engaged by SBC, than it has been at present, to be able to fully participate from the beginning with the exploration / development of the implications and opportunities, in respect of ECC infrastructure and services. ECC expectations under the Duty are expanded upon under Question 1.4, Issues 10 and 12 and throughout our response.

With reference to technical evidence and studies completed/to be commissioned to support the preparation of the Local Plan, ECC consider the following strategies and evidence to be of relevance to the preparation of the new Local Plan going forward:

1. The Association of South Essex Local Authorities (ASELA) and the emerging evidence base that has/is being commissioned for the respective ASELA workstreams including transport, infrastructure and industrial workstreams, as well as the JSP evidence base.

For example, it is recommended that SBC take into consideration the wider functional economic market area of South Essex and forthcoming evidence, such as the South Essex Employment Land Availability Assessment and the South Essex Tourism Study.

2. The Essex Recreation and Avoidance Mitigation Strategy (RAMS).
3. A range of relevant strategies produced either solely by ECC or in collaboration with the Essex borough, city and district councils, and the Greater Essex unitary authorities including SBC, is listed below. This has been provided as ECC evidence for context and consideration to inform our ongoing discussions under the Duty on cross boundary infrastructure matters:

Economic Growth

- [Essex Economic Commission, January 2017](#)
- [ECC Grow on Space Feasibility Study – Executive Summary \(Oct 2016\)](#) (attached)

- [ECC Grow on Space Feasibility Study Final Report \(Oct 2016\)](#) (attached)

ECC Highways and Transportation

- [Essex Transport Strategy, the Local Transport Plan for Essex \(June 2011\)](#)
- [A127 Corridor for Growth - An Economic Plan 2014 \(A127 Route Management Strategy\)](#)
- [A127 Air Quality Management Plan - \(Strategic Outline Case\) March 2018](#)
- [ECC Sustainable Modes of Travel Strategy \(August 2016\) \(SMOTS\)](#)
- [Essex Cycling Strategy November 2016](#)
- [Essex Highways Cycle Action Plans by district \(2018\)](#)
- [ECC's Passenger Transport Strategy – Getting Around In Essex 2015.](#)
- [A127 Statement of Common Ground between the London Borough of Havering; ECC and the South Essex authorities \(including TC\)](#)

ECC Minerals and Waste Planning

- [Essex Minerals Local Plan 2014](#)
- [Essex and Southend-on-Sea Waste Local Plan 2017](#)

Please note that these are Statutory Local Development Plans and should be included and referred to within Figure 2 “Hierarchy of strategies and plans related to Southend”.

ECC Flood and Water Management

- [ECC Sustainable Drainage Design Guide 2016](#)

ECC Education

- [ECC Local and Neighbourhood Planners' Guide to School Organisation](#)
- [10 Year Plan - Meeting the demand for school places in Essex 2019-2028](#)
- [Essex Early Years and Childcare Strategy 2015-2018](#)

ECC Infrastructure Planning

- [ECC Developers' Guide to Infrastructure Contributions \(2016\)](#)
- [Joint Municipal Waste Management Strategy for Essex \(2007 - 2032\)](#)

Greater Essex

- [Essex Design Guide 2018](#)
- [Greater Essex Growth & Infrastructure Framework \(2016\)](#)
- [Emerging Essex Coast Recreation Avoidance Strategy \(RAMS\)](#)

Q1.1 Is there anything missing from the key messages (Figure 8), and why should it be included.

As set out in response to Questions 1 and 1.4, SBC is the Minerals and Waste Planning Authority for Southend Borough, however, whilst there is recognition of the Essex and Southend on Sea Waste Local Plan 2017, there is no reference to or consideration of the requirements in respect of the sustainable use of minerals as a resource, as set out in the NPPF. Please refer to Questions 1.4, 10.4 and 12.5.

Q1.2 Do you disagree with any of the key messages (Figure 8), if so which ones and why?

“Connected and Smart” – In respect of the comments ‘*getting around however I chose*’ and the “*commitment to parking*”, it is suggested that these are reconsidered within a

wider strategy as a commitment to improving public transport and managing demand private transport with ‘an effective parking strategy’ as an alternative approach to better support these goals.

SPATIAL STRATEGY

Q 1.4. How should Southend develop in the future in seeking to deliver 18,000 – 24,000 new homes and 10,000 – 12,000 new jobs, please select from one of the options stating your reasoning.

As set out in response to Question 1, ECC support the preparation of new Local Plan and welcome the references and approach to identify cross boundary issues and the need for close partnership working with adjoining local authorities, which includes ECC’s role as an infrastructure and service provider. ECC also supports the approach to progress the new Local Plan within the framework of ASELA, their respective workstreams and the preparation of the JSP.

If SBC is to meet the housing need in full (in compliance with the NPPF) and, based upon evidence that this is likely to require a new cross boundary GC within Southend and Rochford with additional implications and opportunities on the delivery and provision of ECC infrastructure and services, ECC would want and expect both SBC and RDC to work closely together and with this Council in a close working partnership to help shape and inform the strategic growth proposals and options and continue to do so throughout the delivery phases of work. ECC would expect SBC to seek to maximise their housing delivery within their administrative SBC boundary, however note that the Issues and Options states SBC cannot meet its Objectively Assessed Housing Need in full and that this is a strategic cross boundary planning matter to be explored under the Duty with neighbouring authorities including ECC as a key partner.

This Council expect SBC to actively engage ECC as a key partner under the Duty and close partnership working, from the beginning as proposals evolve in the preparation of their new local plan. ECC is a neighbouring authority and the extent to which ECC bounds the SBC administrative area, any level of planned growth is likely to have either an indirect or direct impact on both SBC and ECC as infrastructure and service providers. This is especially so if SBC is to meet housing and employment needs in full. This is particularly the case in respect of ECC’s role as either a neighbouring authority, or potentially as a host authority, if SBC is to meet its housing and employment needs in full through the development of a new cross boundary GC part located within Rochford District (Spatial Strategy Option 3).

Therefore, ECC would want and expect to be a party to any discussions on both the future plan making arrangements; shaping the strategic growth proposals; as well as the governance and delivery models/mechanisms. This is to ensure the full range of issues and options can be considered by all parties and to maximise developer contributions towards meeting the infrastructure and affordable housing costs.

ECC would expect to be engaged as an active partner on any relevant evidence being prepared and for this to take into account the policies, strategies and evidence listed in response to Question 1.

ECC welcome the approach to progress the new Local Plan within the framework of ASELA and the JSP and seek clarification on how the Local Plan and will align with the

JSP with the same twenty year plan period and the neighbouring Local Plans in Castle Point Borough Council and Rochford District Council areas.

ECC will continue to contribute/co-operate with SBC to address cross boundary strategic planning and infrastructure matters, through the wider South Essex arrangements and bodies, including ASELA and the emerging South Essex 2050 Ambition work and preparation of the JSP; the A127 Task Force; and the OSE.

Given the above, ECC would expect SBC to engage ECC on the following potential cross boundary implications and cumulative issues and opportunities arising from a concentration of growth and development near the boundaries of Southend/Essex, in respect of all three spatial strategy options. Specific cross boundary matters include:

- a. How SBC is to meet their Objectively Assessed Housing Need in full.
- b. Southend urban extension on the Southend / Essex boundary.
- c. Potential new cross boundary GC in Southend and Rochford/Essex.
- d. Strategic transport corridors including the potential options for an outer bypass / extension to the A127.
- e. Cross boundary partnership working with SBC and RDC to lead and shape future growth proposals.
- f. Cross boundary partnership working with SBC and RDC in respect of infrastructure planning, provision, funding and delivery mechanisms; to maximise developer contributions towards meeting the infrastructure and affordable housing costs.

ECC is also interested in any proposals which may have an impact on strategic transport corridors for Essex residents and businesses connectivity within Greater Essex, to London and beyond; and would also expect to be engaged on these matters under Duty.

Set out below are additional specific comments by ECC services in addition to the cross-boundary matters identified above. Further specific comments are provided as appropriate in response to subsequent consultation questions.

Infrastructure Planning. ECC seek cross boundary engagement, in the exploration of a new GC, in respect of infrastructure provision, including but not limited to schools, childcare, highways, waste and recycling, employment and skills. This should include exploration of delivery mechanisms, legal and financial contributions (including S106 and S278 agreements and CIL), having regard to [ECC Developers' Guide to Infrastructure Contributions \(2016\)](#) (ECC's Developers' Guide), and the expectation that each new home planned for should be contributing at least £35,000 towards the required infrastructure needed. This is necessary to maximise developer contributions towards meeting infrastructure and affordable housing costs.

Infrastructure is critical to support sustainable growth and it will be critical to make sure that the right infrastructure is in the right place at the right time, to accommodate the new jobs and homes needed in the future. Any new settlement should be at a scale to secure the necessary infrastructure. The new Local Plan should emphasise the need to provide infrastructure (secured through developer funding) as part of any new development proposals, to ensure the new plan is both viable and deliverable. Given the importance of infrastructure provision and funding (all funding streams) and delivery evidence is considered as part of the assessment of all spatial options. This is to ensure the preferred strategy is viable, deliverable and sound.

The approach in developing a potential Garden Community should be based upon the principles set out in the Government's Garden Community's prospectus, the Town and Country Planning Association's Garden City Principles as well as the International Garden Cities Foundation and their application in our own supporting design guides, including the Essex Design Guide which sets out Guidance on Garden Communities, Planning for Health and an Ageing Population etc.

Housing Provision. ECC note and support SBC using the Government's standard methodology for housing to meet its need in full.

ECC welcome the references to provision of Specialist Housing, including Independent Living for Older People and Adults with Disabilities within the Local Plan.

Economic Growth. It is recommended that consideration is given to the wider economic functional economic market area of South Essex and SELEP strategies, when considering spatial options and allocations, including connectivity and transport; recognising the wider supply chain and employment impacts on surrounding areas. ECC recommend consideration is given to ECC economic evidence including "Grow-on Space"; as well as the wider ASELA "Industrial Strategy" workstream requirements and JSP evidence which are likely to have a spatial dimension.

Transport and Highways. It is recommended that SBC as highway authority undertakes and shares the required highway and transportation assessments, mitigation and provision arising from the spatial strategy and new developments, including impacts on both the local and wider highway and transportation network. SBC will need to continue to work with ECC through the Duty and ASELA to address cross boundary matters and identify required transport infrastructure, ECC would expect to be actively engaged as the host Highway Authority if any developments / improvements are identified within the Essex Highway network. This will include the approach to highway modelling to maintain the strategic transport network in Southend, South Essex and Greater Essex.

It is recommended that SBC make reference to the A127 Task Force which has representation from all South Essex authorities, including SBC. The A127 Task Force will oversee much of the public affairs interaction between the Councils and Government to ensure that the route is seen as strategic and as a potential candidate for re-trunking in order to bring about the long-term improvement required for an area of South Essex with over 600,000 residents. The planning and design work for any improvement of this scale will of necessity require a short-term, medium and long-term phasing. In the short-term ECC has important plans for certain junctions on the route including a significant upgrade of the A127/A130 Fairglen interchange which will become increasingly important for traffic routing from mid and north Essex to south Essex including most likely accessing the A13 and the Lower Thames Crossing. ECC will be looking to plan for the future improvements to the A13 to build up a cohesive plan with both Southend and Thurrock. Whilst the A13 and A127 are the main focal points ECC would be looking to work collaboratively with SBC and other councils in the area on the impact on the A130 and connections to mid Essex; as well as on appropriate transport solutions for urban extensions or new developments on the edge of Southend or extending into the ECC area

ECC acknowledge the need to work with and for SBC to actively engage with ECC and other relevant stakeholders to deliver these joint transport priorities, and ECC will aim to ensure that emerging plans and strategies remain consistent.

ECC recommend that consideration is given to the potential Crossrail 2 eastern branch. The concept for Crossrail 2 to be extended into south Essex is at an early stage however it may influence where future development is located.

Sustainable Transport. It is recommended that greater emphasis is placed on promoting integrated sustainable transport; and encourage the use of sustainable travel plans; suitable linkages for pedestrians and cyclists, and passenger transport options in new developments (particularly if a new GC is progressed) and the connectivity between housing and employment areas and to ensure an integrated transport package of solutions are developed particularly in respect of its relationship and connectivity to South Essex, Essex and London.

This includes the potential for the authorities to collectively consider extending the South Essex Active Travel (SEAT) initiative, beyond the 3 year government funded programme; which paved the way for sustainable transport initiatives for Local Plan proposals to build on.

It is also recommended that reference is made to the opportunity for close working on new evidence for the Local Plan, neighbouring Local Plans and the JSP; to collectively improve connectivity between conurbations and employment areas in South Essex with a network of transit routes as a real alternative to private vehicles to facilitate a modal shift. This could be by either conventional bus or bus based rapid transit; to complement rail networks in the area and include further exploration of the principles and delivery of a South Essex Rapid Transport (SERT) system, with all interested partners, as previously considered by ECC, SBC and Thurrock Council highway authorities to provide a bus based rapid transport system for South Essex.

Minerals and Waste Planning. SBC is the local Minerals and Waste Planning Authority with the responsibility to make local plans for and to determine minerals and waste related developments. However, the Local Plan is silent on these matters and ECC consider it necessary for SBC to provide a holistic approach to meet the growth requirements, which fully considers and integrates the minerals and waste infrastructure and capacity requirements. This includes sustainable development of the strategic growth options; to include consideration of prior mineral extraction and the provision of waste management within employment areas, as well as safeguarding mineral resources and waste management infrastructure. This is considered necessary to comply with the NPPF (chapter 17), the National Planning Policy Statement for Waste (2015) and the adopted Essex and Southend on Sea Waste Local Plan (2017).

ECC, as the statutory minerals and waste planning authority for the two tier area, would expect any proposals within Essex (i.e. outside of SBC administrative area) to comply with the Essex Minerals Local Plan (2014) (MLP) and the Essex and Southend on Sea Waste Local Plan (2017) which form part of the Statutory Local Development Plan and a material consideration for that area.

Flood and Water Management. ECC welcomes the inclusion of reference to flooding and flood risk management. ECC would expect to be engaged on any development on the Southend/Essex boundary, to ensure that any development does not increase flood risk within either area. Any site located on the Essex boundary or discharging into Essex should comply with the [ECC Sustainable Drainage Design Guide 2016](#) (ECC SuDs Guidance) and be subject to consultation with the ECC as Lead Local Flood Authority

(LLFA). Any development outside of SBC administrative area should wholly comply with ECC's SuDs guidance and the guidance relating to surface water flood risk outlined within the relevant district or borough local plan.

Education. ECC notes that SBC is the local education authority and will need to make the necessary education provision arising from any new developments. SBC will need to work with ECC to identify potential cross boundary matters for Primary and Secondary School provision arising from any new developments on the Southend/Essex boundary, especially if Option 3 is selected, which will require cross boundary working.

In respect of Special Education Needs and Disabilities (SEND), pupils within Southend Borough take up Essex places and ECC would expect SBC to refer to and plan enough SEND provision to meet any increasing demand in the future.

Early Years and Childcare. ECC seek reference to EYCC provision within the new Local Plan.

Post 16 Education and Skills. ECC seek reference to post 16 education and support the ongoing close working arrangements between Further Education (FE) colleges across South Essex (including SBC) to provide and deliver cohesive curriculums. It is envisaged there will be an increase in cross boundary movements of post 16 student travel with the rationalisation of curriculum delivery across the South Essex colleges. It is recommended that consideration should be made to support both FE Establishments to construct a sustainable student travel strategy. ECC would expect to be engaged as part of the ongoing close working to develop opportunities for achieving local labour and a skills legacy; and that reference is made to ECC's engagement with the Essex Planning Officers' Association on the relationship between post 16 education and skills with local plans and planning applications.

Customer Services. ECC seek reference to libraries and their role in the provision of public services and that ECC would expect to be engaged by SBC on this matter in respect of any new developments on the Southend/Essex boundary which will require close cross boundary working.

Public Health. ECC welcome the inclusion "health and wellbeing" throughout the Issues and Option Plan and as the approach to underpin sustainable development. ECC consider Health and Well-being to be a cross boundary issue and would expect to be engaged as part of the ongoing close working so that Essex residents benefit from increased access to healthier places throughout Greater Essex.

Environment. ECC welcome the inclusion of "green infrastructure" including environment as a cross boundary matter and will continue to work with SBC

In respect of Ecology, ECC seek clarification on the preparation of a Habitat Regulations Assessment or Appropriate Assessment and recommend that ecology is reconsidered to include reference to residential growth impacts on European habitats with reference to the Essex RAMS.

Sustainability Appraisal. ECC welcome the Interim Integrated Impact Assessment, which provides a good high-level appraisal at this early stage of plan preparation, however seek reference to minerals planning related developments and the Essex Minerals Local Plan.

In moving forward, it will be necessary to identify more detailed alternatives / options as evidence emerges. In progressing the new Local Plan, it is recommended that the SA factors in and is aligned with the SA of the JSP, specifically the strategic growth locations and in terms of any cross-boundary options and trans-boundary / cumulative effects, as that Plan (and SA) progresses.

SECTION 2 – PLANNING FOR GROWTH & CHANGE

ISSUE 2: HOUSING – INCLUDING NEW HOUSING, CONVERSIONS, AFFORDABLE HOUSING, SELF-BUILD.

Q2. How best do you think we should provide for our future housing needs?

Please see ECC's response to Questions 1; 1.4 and 2 to 2.7; in addition to the following.

ECC note that this is the first stage in the preparation of the new Local Plan set within the framework of ASELA and the preparation of the JSP, and the approach to explore potential Spatial Strategies including the identification of broad strategic development options through the Local Plan. ECC supports this approach in principle and the ongoing close working with Southend, the South Essex authorities including ECC to ensure strategic infrastructure planning across administrative borders. In addition, ECC seeks clarification on how the new Southend Local Plan will be progressed in alignment with the JSP.

ECC acknowledges the sensitive nature of the Borough and the need to balance growth with retaining local character. In developing the new Local Plan and preferred strategy, SBC (with Partners) will need to be satisfied that it has identified its preferred spatial strategy, which includes significant Green Belt release, based on a range of proportionate evidence. In so doing, SBC will need to demonstrate that it has considered all reasonable locations for future growth against the relevant criteria and demonstrate that the most appropriate sites have been identified for allocation.

ECC notes the South East Essex Growth Location Assessment provides an initial assessment of potential broad locations for growth and recognise that further detailed studies are to be undertaken, including land outside SBC's administrative area. ECC would expect to be an active party any the assessments of sites/broad locations in on the border/within Essex for their suitability and infrastructure requirements. Any studies and proposals would need to be in accordance with ECC policies, strategies and standards for that area (see Question 1) as statutory infrastructure and service provide within the two tier area.

There may be further sites with potential implications on the strategic road and rail networks which could affect the connectivity of Essex residents and businesses to London and beyond; and would expect SBC to consider these matters with ECC through close working under the Duty and in the preparation of the JSP.

ECC consider infrastructure to be critical to support sustainable growth and it will be critical to make sure that the right infrastructure is in the right place at the right time, to accommodate the new jobs and homes needed in the future. Any new settlement should be at a scale to secure the necessary infrastructure. The new Local Plan should emphasise the need to provide infrastructure (secured through developer funding) as part of any new development proposals, to ensure the new plan is both viable and deliverable.

Given the importance of infrastructure provision and funding (all funding streams) and delivery evidence is considered as part of the assessment of all spatial options. This is to ensure the preferred strategy is viable, deliverable and sound.

The approach in developing a potential new GC should be based upon the principles set out in the Government's Garden Community's prospectus, the Town and Country Planning Association's Garden City Principles as well as the International Garden Cities Foundation and their application in our own supporting design guides, including the Essex Design Guide which sets out Guidance on Garden Communities, Planning for Health and an Ageing Population.

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

ECC welcome the inclusion of housing provision for older people and people with specialist needs and would anticipate that SBC would seek to identify inclusive and sustainable locations, based upon technical evidence, including for example access to services and public transport.

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

ECC recommend consideration is given to the Essex Design Guide 2018, in respect of place making and the type and quality of new communities. This is particularly relevant to any potential new GC being considered under Question 1.4 (Spatial Strategy Option 3) and 12.4 below.

ISSUE 3: SECURING A THRIVING LOCAL ECONOMY – INCLUDING JOB NUMBERS, BUSINESS PREMISES AND EMPLOYMENT SITES.

Q3. How best do you think we can retain and promote employment in Southend?

Economic Growth. ECC welcome the ongoing cooperation with SBC to support the development of policy-level interventions with regard to economic infrastructure and ensuring that it aligns and supports the opportunities as identified in the Essex 2050 vision as well as the development of the JSP. ECC also recommend that the Local Plan seeks to ensure that policy responses also align with the SELEP Strategic Economic Statement, the forthcoming SELEP Local Industrial Strategy and the forthcoming South Essex Productivity Strategy.

Furthermore, given the high proportion of small businesses in Southend Borough, growth of these businesses will require additional Grow-On Space, which ECC's "Grow on Space" study (2016) found to be in short supply across Essex, and this may impact on the wider south Essex Functional Economic Market Area; including the South Essex Grow-On Space Study; and the South Essex Land Availability Assessment.

Skills and Training. ECC welcome the references to the Economic Development Needs Assessment (EDNA) and the recommendation to support and investment for education, skills and training; and support SBC's ongoing close working with ECC and partners to develop opportunities for achieving local labour and a skills legacy.

Future economic opportunities can be stimulated by ensuring new developments require a form of skills and employability training plans. This would enable a range of mitigation activities, in both the construction and end-use phases of development, to increase employment prospects and skills levels. This could include work placement opportunities, apprenticeship opportunities and school or college outreach. ECC is working with the two-tier authorities across Essex through the Essex Planning Officers' Association (EPOA) on the relationship between post 16 education and skills with local plans and planning applications, to embed Employment and Skills Plans to secure planning obligations and contributions to support increased skills levels, increased employment, employability and skills levels for residents, mitigating the impact of new developments.

Highways and Transportation. ECC welcome the reference to and recognition of the need for strong infrastructure connections and continued adequate investment into road and digital infrastructure and the public transport network is regarded as essential for supporting economic development and employment activities across South Essex. However, recommend that greater emphasis and consideration is placed on the role and importance of integrated sustainable transport solutions, including for example passenger transport improvements to access the airport and other commercial sites. Please refer to Questions 1, 1.4, 3, 4.4, 5 and 6 – 6.5.

Q3.1 Should we focus new jobs to the town centre, London Southend Airport and associated Business Park and the northern Southend corridor, including Temple Farm and Stock Road?

Please see ECC's response to Questions 1 and 1.4; this is considered be cross-boundary matters for further engagement with ECC under the Duty.

Q3.2 Should we concentrate on promoting digital, cultural and creative industries; healthcare technology; advanced manufacturing and engineering; and tourism sectors?

Please see ECC response to Question 3

Q3.6 How can we best meet the needs of Small and Medium Sized Enterprises and the need for move-on accommodation as small firms grow?

Please see ECC response to Question 3.

ISSUE 4: PROMOTING SOUTHEND AS A MAJOR RESORT – INCLUDING VISITOR ATTRACTIONS AND ENHANCING TOURISM

Q4.4 Improve accessibility to the central seafront areas for all users. How best do you think this could be achieved?

Highways and Transportation As set out above in response to Questions 1.4 and 3 above, ECC recommend greater emphasis is placed on the role and importance of integrated sustainable transport and exploring alternative transport solutions such as passenger

transport to promote intra and inter urban trips; park and ride schemes to improve access to the sea front and other tourist centres; and access by rail.

Q4.5 Seek further enhanced links between the central seafront and town centre to improve services and facilities. How best do you think this could be achieved?

Please see ECC response to Q4.4

ISSUE 5: PROVIDING FOR VIBRANT AND ATTRACTIVE TOWN CENTRES – INCLUDING SHOPS, LEISURE FACILITIES AND THE FUTURE OF OUR HIGH STREETS

Q5. How best can we ensure that our town centres are successful, vibrant and attractive places in the face of changing retail demands?

Highways and Transportation. Please refer to ECC's Highway and Transportation response to Question 4 and 4.4 above and Issue 6 below (Sustainable Transport). The approach is noted, however recommend that consideration is given to the need to make proper allowance for retaining and improving Passenger Transport access as part of the package of solutions to reduce the need for cars in the town centre.

ISSUE 6: PROVIDING FOR A SUSTAINABLE TRANSPORT SYSTEM – INCLUDING TRANSPORT, ACCESS AND PARKING

Q6. How best do you think we can improve the transport system serving Southend?

Please see ECC's Highway and Transportation; and Sustainable Transport response to Questions 1, 1.4, 3, 4.4, and 5 which apply to Issue 6 and questions.

ECC has the following additional comments.

ECC acknowledge the need to work with and for SBC to actively engage with ECC and other relevant stakeholders to deliver these joint transport priorities, and ECC will aim to ensure that emerging plans and strategies remain consistent. Specific reference should be made to the ongoing joint transport projects (see Question 1 and Question 1.4) and including A127 Task Force, significant upgrade of the A127/A130 Fairglens interchange; the A127 and A13 Route Management Strategies; A127 Air Quality Management Plan (between the Fortune of War and Rayleigh Weir). Whilst the A13 and A127 are the main focal points ECC would be looking to work collaboratively with SBC and other councils in the area on the impact on the A130 and connections to mid Essex, as well as on appropriate transport solutions for urban extensions or new developments within Southend or on the Southend/Essex boundary, or extending Essex.

ECC agree that significant improvements are needed to the transport network, however emphasise that sustainable modes of travel should be prioritised, for both the existing and any new developments. ECC would welcome the opportunity to work collaboratively with SBC and other councils in the area on the impact of any urban extensions or new developments on the edge of Southend or extending into the administrative area of ECC, including evaluation of the relative benefits and dis-benefits of any transport mitigation measures, which could include an outer bypass. ECC would expect this evaluation to

consider the relative merits of all modes of transport, with an aim to minimise additional private vehicle movements.

ECC has reviewed the Sustainable Transport Topic Paper – and seek collaborative working with SBC in respect of the following aspects

- Transport Projects “An Access, Parking and Transport Strategy” and a reviewing of the Southend Local Transport Plan”.
- ECC note the distance to train stations for the Eastwood and Belfairs areas (and the area around Southend Hospital) and wish to work with SBC to retain and improve sustainable linkages from Rayleigh to Southend through these areas.
- ECC note the aspirations to explore potential of the River Thames as a transport resource, and this will be of particular interest for the Canvey area.
- ECC wish to explore the potential for Bus Rapid Transport for any large-scale new developments e.g. in Rochford, linking to central Southend / employment / leisure areas / stations / airport (see Question 6.3 and reference to SERT).
- ECC can confirm that Tourist traffic has a significant impact on the Essex strategic road network (mainly the A127) and would welcome engagement in respect of options to mitigate this.

Q6.1 Seek to make further improvements to the A127. What do you think these should be?

Please see ECC’s Highway and Transportation and Sustainable Transport responses to Questions 1, 1.4, 3, 4.4 and 5 which apply to Issue 6 and questions.

ECC has commenced a refresh of the 2014 “A127 A Corridor for Growth – an Economic Plan” (the A127 Route Management Strategy) jointly prepared with SBC. ECC are working with the South Essex authorities (including SBC) and the London Borough of Havering on this, through the A127 Task Force.

In respect of Air Quality, there are issues along the A127 within Essex (between the Fortune of War and Rayleigh Weir) which need to be addressed in the short term, and ECC is working with the respective Borough and District Authorities.

Q6.2 What do you think should be done to create improved access if a new settlement is built north of Fossets Farm, Garon Park and Bournes Green Chase (see figure 9)?

Please see ECC’s Highway and Transportation and Sustainable Transport responses to Questions 1, 1.4, 3, 4.4 and 5 which apply to Issue 6 and questions.

Q6.3 How should we provide for enhanced sustainable transport provision in the town in the form of rail, bus, park and ride, cycling and pedestrian facilities? What do you think these should be and what should be prioritised?

Please see ECC’s Highway and Transportation and Sustainable Transport responses to Questions 1, 1.4, 3, 4.4 and 5 which apply to Issue 6 and questions.

It is recommended that greater emphasis is placed on promoting integrated sustainable transport; and encourage the use of sustainable travel plans; excellent suitable linkages for pedestrians and cyclists, and passenger transport options in new developments (both

housing and employment) to existing settlements both within the Borough and cross boundary (particularly if a new GC is progressed); and connectivity between housing and employment areas to ensure an integrated transport package of solutions are developed particularly in respect of its relationship and connectivity to South Essex, Essex and London. This should be developed in partnership, especially with neighbouring authorities.

This includes the potential for the authorities to collectively consider extending the South Essex Active Travel (SEAT) initiative, beyond the 3 year government funded programme; which paved the way for sustainable transport initiatives for Local Plan proposals to build on.

In respect of passenger emphasis, it is recommended that greater emphasis and importance is placed on bus services and to improving the access, quality, reliability and scale of the bus network to help mitigate the well advised impacts of traffic growth including increased bus priority measures. These should be explored further in partnership working with local operators, developers and neighbouring authorities, including ECC.

ECC recommend reference and consideration is given to the opportunity for close working on new evidence for the Local Plan, neighbouring Local Plans and the JSP; to collectively improve connectivity between conurbations and employment areas in South Essex with a network of transit routes as a real alternative to private vehicles to facilitate a modal shift. This could be by either conventional bus or bus based rapid transit; to complement rail networks in the area and include further exploration of the principles and delivery of a SERT system, including bus rapid transport (see Q 6 and 6.1), with all interested partners, as previously considered by ECC, SBC and Thurrock Council highway authorities to provide a bus based rapid transport system for South Essex.

ECC suggest consideration is given to ECC's [Sustainable Modes of Travel Strategy](#) which enables the ECC and partners to co-ordinate the provision of services and infrastructure, to enable accessibility to places of employment and education for all.

Q6.4 Provide for park and ride facilities to serve Southend. Where do you think these should be and in what format?

See ECC response to Question 6.3. ECC wish to be engaged in these options.

Q6.5 How do you think technologies such as the internet, electric and driverless cars will affect how we travel over the next 20 years?

Please see ECC's Highway and Transportation and Sustainable Transport responses to Questions 1, 1.4, 3, 4.4 and 5 which apply to Issue 6 and questions.

SECTION 3 – CREATING GOOD QUALITY AND HEALTHY PLACES

ISSUE 7: FACILITATING GOOD DESIGN, HEALTHY LIVING AND BUILT HERITAGE

– INCLUDING DESIGN ISSUES, AMENITY, HERITAGE AND CONSERVATION

Q7. How best do we ensure healthy communities and development is appropriate and of a quality design, whilst ensuring we enhance our built heritage assets?

Public Health. ECC support the inclusion of health and wellbeing throughout this plan and the approach of underpinning this via the sustainable development goals (SDG). The use of SDG's as a foundation supports a health in all policies approach which is key way to embed health and wellbeing throughout policies, ensuring it is considered and maximises the potential for policy to positively influence health. The inclusion of a section on creating good quality and healthy places is another positive which reinforces SBC's commitment for this agenda. Health and wellbeing is a cross boundary issue and there is a good ongoing working relationship between SBC and ECC and wish to continue this on matters related to health and wellbeing within the environment so that Essex residents benefit from increased access to healthier places throughout Greater Essex.

Health and wellbeing is a key part of the NPPF 2018 with an aim of spatial planning being to support creating healthy places. Designing in health into both regeneration and new developments has an emerging evidence base with much guidance existing to do this. This includes addressing the design of homes and spaces, encouraging active environments and the application of active design principles from Sport England, addressing neighbourhoods and supporting communities through density and design, active travel where non-motorised transport is prioritised over motorised, increased access to healthier foods with a decrease on access to hot food takeaways, access to education, training and skills and supporting employment and access to NHS and health infrastructure. Much of this is addressed via the Essex Design Guide which includes a theme on health and wellbeing.

ECC recommend the use of a Health Impact Assessment (HIA) tool. This would then enable the local authority and NHS to assess against whether places are supporting health and wellbeing. This could be through the application of health impact assessments (as supported by the Essex Planning Officer's Association and advised within the MHCLG guidance on plan-making) at an agreed local level. In addition, the assessment of active environments could be made via the Active Design Principles checklist. An HIA is designed to highlight the positives of development and maximise these whilst ensuring that any unintended impacts are either removed or mitigated against. The review of an HIA allows for recommendations for mitigation to be made.

If SBC (and RDC) progress the option of a new cross-border GC, ECC would expect to work in collaboration with health and wellbeing partners including Southend Public Health and NHS partners from the Mid-Essex and South Sustainability Transformation Partnership (STP) to ensure that impacts to health and wellbeing service provision are considered. This would also include access to NHS infrastructure led by the STP estates team. This collective approach would support the wider health and wellbeing system to ensure sustainable delivery of services to meet need. ECC can advise that if this option is progressed that early engagement with health partners occurs to ensure that health and wellbeing is 'designed' in to master-planning for this development so to allow for local evidence based need and supporting strategies and policies to be included (as above).

Q7.3 Should we seek to limit the proliferation of new fast food outlets close to locations where children congregate such as schools, community centres and playgrounds or where there is an overconcentration of existing premises? Are there other ways of tackling this issue?

ECC support the restriction of new fast food takeaways as an option within the plan and suggest this be addressed through either avoiding over-proliferation, over clustering and

addressing this with a targeted approach to areas of deprivation due to the links between obesity and deprivation and also (so to support addressing childhood obesity), limiting access around schools via either a restriction zone or limiting time these premises can trade (i.e. immediately after school or lunchtimes). Further detail on healthier food environments can be found via the role of health and wellbeing in plan-making guidance from MHCLG.

Historic Environment. ECC suggest that the heading and content under “Natural and Built Heritage” is expanded to the “Natural, Historic and Built Environment” to ensure that the new Local Plan specifically acknowledges and refer to archaeology (in addition to the reference to scheduled monuments).

ISSUE 8: PROVIDING COMMUNITY SERVICES AND INFRASTRUCTURE – INCLUDING UTILITY, HEALTH, EDUCATION, SPORTS AND LEISURE FACILITIES AND DIGITAL INFRASTRUCTURE

Q8. How best can we provide for our future community needs to secure a sustained high quality of life and well-being having regard to future growth?

Please see ECC’s response to questions Q1 and 1.4, in addition to the following:

Customer Services. ECC would expect SBC to include the provision of Library services within any future community needs and for these to be secured as part of any future growth. It is likely the new developments will affect the current service ECC offer, the stock held at the sites and the partner services they currently host. In respect of a potential new cross boundary GC this will increase demand for the current ECC Library service, the registration service (which is hosted in libraries to register births and deaths) and blue badge assessments. This is considered to be a cross boundary matter and ECC would expect SBC to engage RDC on this option under the Duty, including developer contributions.

In respect of Library provision, ECC has consulted on, and are currently analysing the feedback on the draft future library services strategy that propose the service will be delivered, according to need, through a range of physical and online services:

- enhanced eLibrary services to make it easier for customers to access library materials anywhere, anytime from their own devices;
- a network of libraries across the county, run by Essex County Council alone or in partnership with other groups or organisations;
- outreach to bring some library services and activities out to communities according to need, such as running a children’s story time in a village hall;
- mobile libraries, which currently serve 217 stops around the county but could see more stops added depending on need; and
- Home Library Service, where volunteers bring books and other loan items to people in their own homes.

Q8.1 Are there any specific issues regarding educational provision that you consider need to be addressed with respect to new development?

Please see ECC’s response to Q1 and 1.4; in addition to the following specific comments.

Education. ECC note that SBC is the LEA for Southend and have no comments at this early stage in the preparation of the Local Plan other than ECC would expect SBC to determine how they mitigate their own impacts. ECC wish to be engaged with the Local Plan as it progresses, with the identification of growth locations, for consideration of cross boundary impacts on Essex school provision under the Duty.

Early Years and Childcare. The Local Plan recognises that educational facilities are almost to capacity and also makes recommendations around further education however there is no reference to EYCC provision. To ensure ECC provides a sufficient number of childcare places, a clear understanding of cross border developments will be needed to plan accordingly. ECC consider this to be a cross boundary matter and wish to be engaged by SBC under the Duty, in the identification of the new EYCC requirements arising from new housing and employment growth locations on the Southend/Essex border, as the Local Plan progresses.

Special Education Needs and Disabilities. ECC note that there is no reference to SEND provision; whilst there are pupils within Southend that take up Essex places. ECC consider this to be a cross boundary matter and would expect SBC to plan for sufficient special needs provision through the new Local Plan to meet increasing demand.

Post 16 Education. Please see ECC response to question 1.4. ECC consider this to be a cross boundary matter and would expect SBC to refer to and make provision for Post 16 Education with the new Local Plan; and ECC wish to be engaged in the process.

Q8.2 How do you consider that health issues should be addressed in the Local Plan? How can new development encourage healthy lifestyles?

Please see ECC's Public Health comments in response to Questions 1, 1.4 and 7 and 7.3.

Q8.4 As part of planning approvals should we ensure that all developments deliver quality broadband infrastructure and connectivity?

ECC would anticipate that SBC would require the provision of digital infrastructure in accordance with NPPF. ECC Superfast Essex, work with Essex borough, city and district authorities and require provision of digital and broadband infrastructure policies within new Local Plans, to support new developments.

ISSUE 9: ENHANCING OUR NATURAL ENVIRONMENT – INCLUDING GREEN SPACE, HABITATS AND WILDLIFE, LANDSCAPE

Q9. How best do we protect and enhance our environment in the face of increasing growth and development pressures?

LLFA. ECC would anticipate that the natural environment should be maintained and where possible improved as part of any new development. ECC anticipate that flood risk management would have a key role in providing green and blue infrastructure corridors throughout Southend, in particular, linking areas of habitat across the boundaries of adjacent administrative areas. ECC notes SBC is the LLFA for Southend with their own policies addressing the management of surface water as part of new developments; ECC suggest that these are as closely aligned as possible with ECC, to help provide

consistency for developers working within/across both LLFA areas. ECC therefore seek wording to acknowledge the importance of SuDS provision in developing the natural environment.

Ecology. ECC seek clarification and reference to Habitat Regulations Assessments and/or Appropriate Assessment within the preparation of the new Local Plan. ECC consider this to be of relevance given the area of the new Local Plan lies within the Zone of Influence for the Essex RAMS being prepared collaboratively by Essex Authorities (including SBC). ECC anticipate there will be a need for an Appropriate Assessment, and that the new Local Plan and any housing allocations to be developed with proportionate financial contribution towards delivery of mitigation measures at the coast in perpetuity to avoid recreational disturbance, to comply with the Essex RAMS policy to meet the legal requirements of the Habitats Regulations and in compliance with the NPPF

Q9.1 Work with other stakeholders, funding bodies and developers to identify opportunities to promote and enhance the natural environment, and incorporate net gains for biodiversity in new development?

Please see ECC's response to Questions 1 and 1.4, including relevant strategies and evidence, including but not limited to ECC SuDS (2016); the Essex Design Guide (2018) and in particular the emerging Essex RAMS. ECC support a positive approach to the role and provision of Green and Blue Infrastructure; and suggest this includes links to the neighbouring authority areas and respective studies including the South Essex Green Infrastructure Strategy and the emerging Green Essex Strategy, being prepared by the Essex Green Infrastructure Partnership

Q9.2 Seek to enhance the borough's network of green infrastructure using developer contributions for the management of green and open spaces and introduction of pocket parks?

Overall ECC welcome the approach and suggest consideration is given to the Green Essex Strategy. ECC welcome the opportunity to engage with SBC in this project, especially in if there is a new cross boundary GC.

Q9.3 In liaison with adjoining local authorities seek to provide new country park and open parkland facilities (including from developer contributions) as part of strategic development sites, including where they help mitigate pressure on some of the more sensitive coastal habitats?

Please see ECC's response to Questions 1, 1.4, 9, 9.3 and 12 below (regarding ECC's Developers Guide to Contributions). ECC anticipate that SBC would explore this further with RDC and ECC as a cross boundary matter under the Duty.

ISSUE 10: PLANNING FOR CLIMATE CHANGE – INCLUDING ENERGY EFFICIENCY, FLOODING AND COASTAL CHANGE, AGRICULTURAL LAND

Q10. How best do we plan for the future impacts of climate change?

Please see ECC response to Questions 1 and 1.4; as well as the comments below which apply to Issue 10 Questions 10.1 – 10.6.

LLFA. ECC is the neighbouring LLFA and would expect SBC to ensure that any development on the Southend/Essex boundary to not increase the flood risk within either authority area. ECC consider this to be a cross boundary matter and to be explored with ECC under the Duty. ECC would expect that any site located on the boundary of Essex or discharging into Essex should comply with Essex SuDS Guide and ECC should be consulted on any such developments as the neighbouring LLFA. In respect of any development within the Essex LLFA area (i.e. outside the administrative boundary of SBC), these should wholly comply with the Essex SuDS Guide and the guidance relating to surface water flood risk outlined within the relevant district or borough's local plans.

In respect of the Blue /Green Infrastructure Topic Paper, supporting the Issues and Options Consultation, ECC is concerned that there is no consideration of the numerous ordinary watercourses that cross Essex. While there are too many to be individually addressed, ECC would expect the report to acknowledge that the quality and volume of the water in these features will have an impact on more recognised downstream features.

ECC consider the references focusing solely on flood risk within the Central Seafront Area, to be too specific as all areas of new development should be managed to ensure that, as a minimum requirement, flooding doesn't get worse. Where possible, ECC recommend that betterment is sought whenever possible, in particular in areas of existing flood risk. This approach is critical for any cross-border development or development that takes place within ECC's administrative boundary. ECC would encourage SBC to take a similar approach within their own administrative area to help provide consistency for developers working in both areas.

Q10.2 Require mitigation and adaptation measures to deal with the increase in average temperatures and greater rainfall, including tree planting and urban greening?

See ECC response to Question 10.2 above.

Q10.3 Support renewable and low carbon energy schemes, including photovoltaic (PV) panels, biomass plants and electric vehicle charging points?

Please see ECC's Highways and Transportation, and sustainable Transport comments in response to Q1, 1.4, 3, 4.4, 5 and Issue 6. In particular consideration should be given to improving passenger and public transport as part of encouraging a modal shift in transport.

Q10.5 Should we balance the need to retain the best and most versatile agricultural land for food security against future needs for housing and local services?

Minerals and Waste Planning. As stated in response to Question 1 and 1.4, SBC is the MWPA, for the borough however the Issues and Options is largely silent on mineral planning issues and there is no explanation for excluding these statutory obligations, from consideration.

SECTION 5 – DELIVERABILITY

ISSUE 12: ENSURING THAT THE NEW LOCAL PLAN IS DELIVERED – INCLUDING PRIORITIES FOR DELIVERY, INFRASTRUCTURE DELIVERY, COMMUNITY INFRASTRUCTURE LEVY

Q12. How best do you think the Local Plan can be effectively delivered in the face of limited resources?

Please see ECC response to Questions 1, 1.4, and Issue 6. ECC consider this to be a cross boundary matter and would expect SBC to engage with ECC in respect of any developments on the Southend/Essex border and/or in Essex under the Duty.

Infrastructure provision and funding. ECC anticipate that the new Local Plan would include clear policies for the full provision, enhancement and funding of infrastructure arising from planned development. Mechanisms would include planning obligations, the use of a Community Infrastructure Levy (CIL), and the ability to negotiate specific contractual obligations for major strategic sites, and any new cross boundary Garden Settlement would be in accordance with the Garden City principles defined by the Town and Country Planning Associations Garden City Principles (or subsequent updated guidance) and the wider definition of sustainable development outlined in the NPPF. This is to ensure the delivery of sustainable development is in accordance with the NPPF.

ECC welcomes the recognition that infrastructure is critical to support sustainable growth and to make sure SBC has the right infrastructure, at the right time, to accommodate the new jobs and homes needed in the future and the acknowledgement of ECC's role in the provision of local and strategic infrastructure.

ECC wishes to be proactively engaged with the assessment of the spatial options and site allocations, given the importance of infrastructure provision and funding, which will vary depending upon the spatial strategy and site allocations, with their respective individual and cumulative infrastructure requirements; impacts and opportunities on the delivery of ECC service areas.

Q12.1 Continue to work in partnership with the private, public and voluntary sector plus neighbouring authorities to secure funding for key infrastructure projects?

Please refer to ECC response to Questions 1, 1.4 and Q12, ECC consider this to be a cross boundary matter and would expect SBC to engage with ECC under the Duty.

ECC agrees that Infrastructure is critical to support sustainable growth and it will be essential to ensure SBC has the right infrastructure, at the right time, to accommodate the new jobs and homes needed in the future. ECC welcome the acknowledgement of ECC's role as a neighbouring authority working in partnership with SBC, ASELA and partners in the provision of Local and Strategic infrastructure.

ECC wish to explore and understand the potential implications of the nature and scale of developments on financial contributions, given the pooling of contributions under the CIL Regulations and hence potential viability and delivery issues which will be vary for each of the spatial options.

As stated in response to Questions 1.4 and 10, the new Local Plan should emphasise the need to provide infrastructure (secured through developer funding) as part of any new development proposals, to ensure the new plan is both viable and deliverable. The necessary infrastructure funding (including all funding streams) and delivery evidence needs to be fully considered as part of the assessment of the spatial strategy to ensure the preferred strategy is viable, deliverable and sound.

Q12.2 Set out priorities for project delivery. What do think these priorities should be and how should any phasing be applied?

See ECC response to Questions 1, 1.4 and 12.

Q12.3 Increase the Community Infrastructure Levy tariffs to fund future projects?

See ECC response to Question 1, 1.4 and 12.

Q12.4 Through Garden Communities key principles ensure land value capture and long-term stewardship for the benefit of the community, to provide and coordinate the necessary infrastructure?

Please refer to ECC response to Questions 1, 1.4, 2 and 12- 12.3.

ECC would expect GC principles to be applied, as set out in response to Question 1 and 1.4. ECC consider this to be a cross boundary matter and would expect to be actively engaged by SBC as a key partner under the Duty through close working from the beginning as the proposals evolve in the preparation of the new local plan.

Q12.5 Do you have any other issues/ comments?

Sustainability Appraisal. See ECC response to Questions 1 and 1.4.

ECC seek reference to and consideration of the Sustainable Use of Minerals Resources (NPPF Chapter 17) and the Essex Minerals Local Plan 2014.

Subject to the above, ECC welcome the general approach however suggest the Integrated Impact Assessment (IIA) will need to identify more detailed alternatives / options once the Plan's evidence base emerges. This will crucially need to factor in realistic site options within the Plan area. An approach to including the findings of the JSP Sustainability Appraisal, specifically strategic growth locations, will need to be factored into the narrative of the IIA.

With respect to Table 1 IIA Objectives and the framework for the appraisal of the Plan, it is suggested more could be included at the next stage regarding how impacts will be identified and how these translate to the individual site assessments.

South East Essex Growth Location Assessment

ECC wish to be engaged by SBC and partners in the next stage of this study having regard to ECC's response to the Issues and Options consultation.