

**DESIGN GUIDE**

**SUPPLEMENTARY PLANNING DOCUMENT**

**REPORT OF CONSULTATION**

**<INSERT COVER>**



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## Section 1: Introduction

- 1.1 Thurrock Council is preparing a new Local Plan. This plan will be used to guide decisions on planning applications for development as well as set out the strategic direction of the area on social, economic and environmental matters. Supplementary Planning Documents (SPDs) are prepared to provide additional detail and guidance to support policies and proposals in the adopted plan. They do not have the same weight or status as policies in the plan and are not independently examined, but once they are adopted, they can still form a 'material consideration' in determining planning applications.
- 1.2 Preparation of a Supplementary Planning Document must follow a number of stages to ensure that local people and other stakeholders are fully engaged in the process and that its contents are based on robust evidence. The main stages followed in preparing a Supplementary Planning Document are set out in Figure 1. This report specifically details the consultation/engagement undertaken in the preparing the Thurrock Design Guide Supplementary Planning Document.

**Figure 1 – Process for preparing a Supplementary Planning Document**



### Statement of Community Involvement

- 1.3 The Council is required by legislation to produce a Statement of Community Involvement (SCI)<sup>1</sup>. The SCI sets out the activities the Council must legally undertake

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<sup>1</sup> The latest version of the Statement of Community Involvement was adopted by the Council in November 2015 and is available to view in libraries and on Council's website ([www.thurrock.gov.uk/localplan](http://www.thurrock.gov.uk/localplan)).

when preparing a Local Plan and/or a Supplementary Planning Document along with setting out what the Council may do. These include making consultation documents available on the Council's webpage and in hard copy of the Civic Offices, Grays and in all of the borough's libraries.

1.4 The Council is keen to engage as many people as possible in the development of the Local Plan and is achieving this by building upon the basic requirements of the SCI and promoting range activities which go above and beyond the legal requirements including, but not limited, to:

- The formation of four Local Plan Forums (Residents; Youth; Developers; and Businesses)
- Organising a series of drop in events across the borough to allow people to come along and share their views in person.
- Setting up online polls and quick capture consultations to allow more people to have their say on the big questions and nominate sites for inclusion in the emerging plan.

## **Section 2: Consultation on the Draft Design Strategy SPD**

- 1.5 The process for preparing and adopting Supplementary Planning Documents is set out in the Town and Country (Local Planning) (England) Regulations 2012 and the Council's adopted Statement of Community Involvement. When preparing a new Supplementary Planning Document it is important that a local planning authority should both invite and consider representations from specific consultation bodies, local residents or other persons carrying on business in the local planning authority's area about the content and intent of a proposed Supplementary Planning Document.
- 1.6 A draft of the Design Guide (previously known as Design Strategy) was published for public consultation from 26th February to 11th April 2016 alongside the Thurrock Local Plan Issues and Options (Stage 1) document. The purpose of the consultation was to obtain the views of stakeholders, local businesses and the community on the draft document and any other matter that they felt that the document needed to address.

### **Bodies and persons invited to participate in the consultation**

- 1.7 The Council consults extensively on all planning documents and has an ever evolving consultee database stored on the Council's online consultation portal. This system is updated at each consultation event or when notified by consultees. All Specific Consultees (as identified under Part 1 of the 'Regulations') have been consulted. In addition, the Objective consultee database ensures that all interested parties who have previously expressed an interest or commented are notified by means of email or letter. This list currently consists of circa 4500 persons or groups.

### **Publicising the consultation**

- 1.8 All specific and general consultees received a copy of the consultation letter either in writing or via email. The letter included information about the consultation including information about where to view the consultation documents and how to make comments.
- 1.9 A number of articles were published in the local press explaining the consultation documents and highlighting the consultation events planned around the Borough. In addition, the consultation process was advertised on the Council's Twitter account and on the Borough Council's Facebook page. Posters advertising the consultation were also placed in several community centres, libraries and bus stops across the borough.

### **Overview of consultation activities**

- 1.10 The Council undertook a range of activities during the consultation period which went above and beyond the legal requirements; this was to ensure that everybody who wanted to could get involved. Figure 2 sets out a summary of the activities undertaken during the formal consultation period.

**Figure 2 – Consultation activities undertaken during the consultation period**

Consultation Activity	Intended Participants
<p><b>Formal Consultation Document:</b> A full copy of the consultation document was made available at the Civic Offices in Grays, at all libraries and online. Consultees were encouraged to use the Council’s consultation portal to respond to the consultation, with hard copies of the comments form only made available on request from the Civic Offices or the libraries.</p>	<ul style="list-style-type: none"> <li>• Statutory Consultees and Duty to Cooperate Bodies</li> <li>• Local Businesses</li> <li>• Local Community/ Interest Groups</li> <li>• Local Residents</li> </ul>
<p><b>Local Plan Roadshows:</b> The Council hosted 12 roadshow events over the consultation period. These events provided local residents; businesses and interest groups with the opportunity to discuss the consultation document with officers and participate in some art based visioning activities (burning issues board).</p>	<ul style="list-style-type: none"> <li>• Local Businesses</li> <li>• Local Community/ Interest Groups</li> <li>• Local Residents</li> <li>• Site Promoters and Developers</li> </ul>
<p><b>Community Forum and Interest Group Meetings:</b> To raise awareness of the consultation and stimulate discussions in local communities the Growth and Strategy Team contacted local community forums and interest groups to see if they would like a member of the team to deliver a presentation to their group at their next meeting. In total the Growth and Strategy Team attended 5 meetings during the consultation period.</p>	<ul style="list-style-type: none"> <li>• Local Businesses</li> <li>• Local Community/ Interest Groups</li> <li>• Local Residents</li> </ul>


**Summary of consultation responses**

1.11 During that consultation period, the Council received 53 formal responses from local residents, statutory consultees and interest groups and series of informal comments from internal colleagues in areas such as Public Health. Although the majority of responses received were supportive of the document and the approach there were concerns by stakeholders that some elements of the draft SPD were too prescriptive, while others were too ambiguous. A summary of the consultation responses and Officers’ responses are attached to this report in Appendix 3. The Design Guide has been amended in response to relevant comments following the consultation. The main changes were removing elements of repetition, condensing some of the statements and improving the clarity of others.



# APPENDIX 1: Evidence relating to raising awareness of the consultation during the consultation period

## Consultation letter



Thurrock Council  
Growth and Strategy Team  
Civic Offices  
New Road, Grays

«ContactFull\_Name» Date: 26 February 2016  
«ContactCompany\_\_Organisation» Our reference: LPIO-2016-02  
«ContactAddress\_Line\_1»  
«ContactAddress\_Line\_2»  
«ContactAddress\_Line\_3»  
«ContactPost\_Town»  
«ContactCounty»  
«ContactPost\_Code»

Dear Sir/Madam,

**THURROCK LOCAL PLAN ISSUES & OPTIONS (STAGE 1) AND THURROCK DESIGN STRATEGY CONSULTATION**

I write to inform you that Thurrock Council is seeking comments on the Thurrock Local Plan Issues and Options (Stage 1) and Thurrock Design Strategy Consultation Documents.

**Thurrock Local Plan Issues and Options (Stage1) Consultation**

The Thurrock Local Plan Issues and Options (Stage1) Consultation Document seeks your views on the key issues that the new Thurrock Local Plan will need to address. Your comments will then be used to inform the next stages of the Local Plan process including specific policy options and site allocations.

It is a legal requirement of the Planning and Compulsory Purchase Act 2004 that Thurrock's new Local Plan is accompanied by a Sustainability Appraisal (SA) which identifies the likely significant effects of the plan and identifies ways in which any adverse impacts can be mitigated. At this early stage of the plan-making process the Council has prepared and published for consultation the **Thurrock Local Plan Sustainability Appraisal Scoping Report**. Following the conclusion of the consultation exercise your comments will be taken on board in developing the SA as work progresses on preparing the Local Plan.

**Thurrock Design Strategy**

The Council is also consulting on the **Draft Thurrock Design Strategy** which sets out guidance on how new developments in Thurrock should be designed in order to improve and enhance the Borough's built and historic environment. Your comments will help us prepare the final Design Strategy which will then be adopted and used by the Council in considering planning applications for new development.

**Thurrock Brownfield Register and Call for Sites 2016**

As part of the Local Plan process we are currently inviting landowners, developers and other members of the public to suggest possible sites within Thurrock which could be developed or protected for a wide range of uses (homes, jobs and open space).

The Thurrock Brownfield Register and 'Call for Sites' exercise will not in itself determine whether a site should be allocated for development as all submitted sites will be subject to

detailed testing to evaluate their suitability and deliverability for development. This outcome of this work will be used to inform the preparation of the new Local Plan.

If you have previously submitted a site or sites for consideration please note that you do not need to resubmit them again as they will be automatically taken into consideration for assessment.

If you know of a site that you think could be used in the future for development, please complete a 'Call for Sites Response Form' which can be found on the Council's Local Plan webpage [thurrock.gov.uk/localplan](http://thurrock.gov.uk/localplan).

#### **How Do I Comment?**

The consultation documents will be available for public consultation for six weeks from Friday 26 February through to 5pm on Monday 11 April 2016. The easiest way to have your say is on-line via the Council's interactive consultation system which can be accessed through the Local Plan webpage. Comments forms are also available on request at the Civic Offices and in all libraries in the Borough.

#### **Local Plan Roadshows**

Throughout the consultation period we will be running a series of drop-in events across the Borough. At each event background information on the Local Plan process will be available to view and Council Officers will be on hand to answer questions. Information on the timing and location of these events can be found on our website.

#### **Local Plan Forums**

To support the Local Plan process we have created 4 Local Plan forums for businesses, developers, residents and young people.

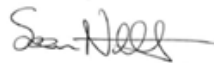
These forums make sure local people and businesses can genuinely influence the plan. Forum members will be involved throughout the preparation of the Local Plan. If you are interested in joining one of the Local Plan forums please contact the Growth and Strategy Team

#### **How will my comments be used?**

We will acknowledge receipt of your comments and fully consider them, although the Council will not enter into individual correspondence. Comments received will be published on the Council's consultation portal in accordance with the Data Protection Act and be used to prepare the next stage of consultation on the Issues and Options (Stage 2) Document.

Should you have any questions about the Local Plan or Thurrock Design Strategy please contact the Growth & Strategy Team on 01375 652705 or by e-mail [growth&strategy@thurrock.gov.uk](mailto:growth&strategy@thurrock.gov.uk)

Yours faithfully



Sean Nethercott - Growth and Strategy Team Leader

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Thurrock Enquirer

18 Advertisement (1) www.thurrock.gov.uk In2 In2 www.thurrock.gov.uk (1) Advertisement 19

## Thurrock Local Plan

# Have your say and help shape Thurrock's future

Thurrock is set to change a lot over the next 20 to 30 years with a growing population, increased investment in industry and changes in the way people access key services. We need to make sure that this change is planned for in a way that makes Thurrock an even better place to live, work and visit.

Since the 'Core Strategy' was adopted in 2011 there have been substantial changes to national policy. Although some of the policies were updated following a focused review, others required additional evidence. Without an up-to-date Plan in place, the council will be at risk of speculative applications being approved on appeal.

The council is at an early stage in preparing the new Local Plan and is looking for people to have their say on the big issues affecting the borough and its environment.

To have your say and to find out more information visit:  
[thurrock.gov.uk/localplan](http://thurrock.gov.uk/localplan)

**Local Plan Forums**  
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**2016 Call for Sites**  
 Last year over 170 sites were submitted to the council to be considered for other uses in the new Local Plan. If you know of any sites that the council should consider for new uses in the Plan, please complete a 2016 Call for Sites Form. Forms are available online and in Thurrock town centres.

**Draft Design Strategy**  
 High-quality design is fundamental to the creation of high quality places and has a significant impact on quality of life. The Design Strategy document sets out guidance on how new developments in the borough should be designed. Once adopted, the Design Strategy will be used to check all planning and design proposals in Thurrock, as well as other planning and design proposals in the borough.

**Local Plan Roadshows**  
 Throughout the consultation period we will be holding a series of drop-in events across the borough. Details of planned roadshows on the Local Plan are below.

Further dates are expected to be added to the consultation timetable, so please check online for regular updates.

- Friday 11 March, 9am to 4:30pm: Stanford-le-Hope Children's Centre, Copland Road, Stanford-le-Hope, SS11 1NF
- Tuesday 15 March, 10am to 6:30pm: Corringham Library, St John's Way, Corringham, Stanwood-le-Hope, SS11 7LJ
- Friday 18 March, 5pm to 7pm: Orsett Churches Centre, High Road, Orsett, RM16 3EP
- Tuesday 22 March, 9am to 5pm: Aveley Youth and Community Centre, 100 High Street, Aveley, RM11 4BW
- Wednesday 23 March, 10am to 5pm: Grays Shopping Centre, Crown Road, RM11 6QE
- Thursday 24 March, midday to 6:30pm: Chadwell Library, Stratford Road, Chadwell St Mary, RM16 4AP
- Tuesday 29 March, 10am to 6pm: St Stephen's Church, London Road, Purfleet, RM19 1DD
- Thursday 31 March, 10am to 5pm: East Tilbury Library, Princess Avenue, East Tilbury, Tilbury, RM18 8ST

[thurrock.gov.uk](http://thurrock.gov.uk)

Thurrock Gazette

38 Thurrock Gazette Thursday March 10, 2016 www.thurrock.gov.uk thurrockgazette.co.uk Thursday March 10, 2016 38

## Thurrock Local Plan

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[thurrock.gov.uk](http://thurrock.gov.uk)





## APPENDIX 2: Local Plan Roadshow Images





### APPENDIX 3: Full list of formal consultation responses including officer comments and actions

Comment ID	Consultee	Consultation Point	Comment Type	Comment justification and suggested changes	Officer Response:	Proposed Actions:
TDS_1	Sport England (Roy Warren)	Making Connections - C3) Promotes active and healthy lifestyles	Disagree	<p>Sport England welcomes the principle of promoting active and healthy lifestyles as one of the key considerations that must be incorporated into design to make safe and effective connections for all travel modes. The specific references in the design strategy to Sport England/Public Health England Active Design guidance are also welcomed. This shows that the Council recognises the role of design in achieving the wider objective of promoting active health communities and would be consistent with the NPPF and the Council's corporate/community priorities and the adopted Core Strategy. However, given the importance of promoting active and healthier lifestyles in Government policy and the Council's own policies, promoting active and healthier lifestyles should not just be a consideration in the context of making connections. It should be an integral part of 'Understanding the Place' (e.g. consideration A2 - incorporating strategic green infrastructure features) and 'Working with Site Features' (e.g. consideration B5 - identifying and incorporating green infrastructure) as well for instance. As set out in the 10 principles in the Active Design guidance, the principles extend beyond active travel and making connections. While for instance the Design Strategy legitimately considers the role of green infrastructure in design in terms of landscape, biodiversity, travel etc. objectives, it is not considered from an active/healthy lifestyle perspective.</p> <p>All parts of the design strategy (beyond consideration C3) should be reviewed to assess how promoting active and healthy lifestyles can be incorporated into the whole design process especially in terms of the parts relating to 'Understanding the Place' and 'Working with Site Features' as well as considering applicability in the local place typologies identified in the strategy. The Active Design guidance principles and case studies provide detailed advice on how this can be interpreted in practice. Furthermore, while acknowledging that the design strategy currently has to be based on policy PMDP2 of the Core Strategy, the emerging local plan that will replace the Core Strategy should be used to provide an updated design policy framework which includes the promotion of active and healthy lifestyles as a criteria that development proposals must meet. This is absent in the current policy.</p>	Agree, in part. Objective A2 is drafted in the context of landscape. Function of "recreation" is stated in para. 3.13.	Ensure that the recreational value of movement networks is appropriately reflected.

Comment ID	Consultee	Consultation Point	Comment Type	Comment justification and suggested changes	Officer Response:	Proposed Actions:
TDS_4	Historic England (Michael Stubbs)	Paragraph 1.9	Not stated	Paragraph 1.9. This refers to 'national design guidance' which is not a defined term in the NPPF. We recommend that the Council adds a technical footnote with a definition and/or a list of key documents which would fall within this umbrella term. We have assumed that these documents are those listed in paragraph 2.15. A cross-reference to paragraph 2.15 would be useful.	Agree.	Clarify that this is a term to capture content in the NPPF and NPPG. Change "National Planning Policy Guidance to National Planning Practice Guidance
TDS_5	Historic England (Michael Stubbs)	Paragraph 2.4	Not stated	Chapter 2 and paragraph 2.4. This chapter deals with the importance of good design. We welcome reference to the work by the Commission for Architecture and the Built Environment (CABE) and the Homes and Communities Agency (HCA). We recommend the addition of other guidance produced by Historic England, which has been recently updated and reference should now be to the Historic England Advice Note 4: Tall Buildings. This can be accessed at <a href="https://content.historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/heag037-tall-buildings.pdf">https://content.historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/heag037-tall-buildings.pdf</a> / While our guidance does stress the need for good design, it also identifies that tall buildings can have a negative impact on the historic environment, noting that the NPPF also makes it clear that 'the Government attaches 'great weight' to the conservation of designated heritage assets, including their setting' (paragraph 132). The SPD should make it clear that design alone cannot mitigate the harm to the historic environment resulting from an inappropriately sited tall building and therefore proposals for tall buildings that result in unjustified and unacceptable levels of harm to designated heritage assets will not be supported. We recommend additional text to this effect within existing paragraph 2.4.	Paras 2.1-2.5 focusses on investing in design quality and relevant research in that context it is not intended to be an exhaustive list of design guidance provided by key stakeholders and influencers.	No action required.
TDS_6	Historic England (Michael Stubbs)	Paragraph 2.13	Not stated	As national planning policy guidance is regulated updated and amended, we recommend a link to the web-site and a caveat to the effect that it is occasionally updated.	Disagree, current reference is adequate. Para. 2.12 states that the NPPG is a "live resources that is continually updated".	No action required.
TDS_7	Historic England (Michael Stubbs)	Paragraph 2.17	Not stated	This refers to landscape characterisation work within the scope of further guidance and background evidence documents. We recommend reference also to the historic characterisation work that the Council have previously undertaken.	The Council is currently in the process of updating its evidence base relating to the historic environment this evidence will inform decision making and future updates of the Design Strategy SPD.	No action required at this time.
TDS_8	Historic England (Michael Stubbs)	Paragraphs 2.19 to 2-25	Not stated	This deals with 'Understanding the Character of Thurrock' and we recommend mention in the explanatory text of the scheduled monuments at Tilbury Fort and Coalhouse Fort, for example, and their link to the history of the area, the evolution of defences along the Thames and the riverside/riverscape setting. Reference to the challenges that confront heritage assets links to heritage-at-risk and the grade II* State Cinema at Grays is	Agree, in part. The scope of the text is general to describe the evolution of Thurrock's character, rather than to highlight the "challenges".	Amend caption to recognise Grade II* Listed status of State Cinema.



Comment ID	Consultee	Consultation Point	Comment Type	Comment justification and suggested changes	Officer Response:	Proposed Actions:
				such an example. A note to this effect would usefully accompany the image at page 16.		
TDS_9	Historic England (Michael Stubbs)	Section 3	Not stated	This section deals with the site appraisal process prior to submission of planning applications. It covers both matters of setting and views and involves the appraisal of impact on heritage assets. As an understanding of settings policy has been published since the adoption of the Core Strategy in 2011 and as the concept of significance was most recently included in the NPPF, Historic England recommend that these matters are introduced at paragraphs 3.8 to 3.11 or within 3.29 and section B1 on the appraisal of a site's features. Our Advice Note 3 (AN3) 'The Setting of Heritage Assets' and the NPPF Glossary provide definitions of setting. The Government's planning objectives for the historic environment is that conservation decisions are based on the nature, extent and level of a heritage asset's significance and are investigated to a proportionate degree. Our guidance sets out a five stepped staged approach to proportionate decision-making and this can be accessed at <a href="https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/">https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/</a>	Disagree, this is the role of more primary development management policies. However, there may be some opportunity to elaborate in B1 where setting is mentioned with reference to significance and relative importance.	Review objective B1 and seek to add additional detail where appropriate.
TDS_10	Historic England (Michael Stubbs)	Paragraph 3.30	Not stated	This paragraph deals with heritage assets and this term covers both designated and locally listed assets. We recommend reference to the definition in the NPPF Glossary. Where the design guide refers to wider historical and cultural references, the term significant places is also used as an umbrella to cover statutorily protected and assets of more local interest. We do recommend reference to the policy test of impact upon significance as is contained in the NPPF at its paragraph 132. We recommend that the aspirational images as used at pages 30 and 33 have a brief explanation of the intended design features as well as the location and perhaps the year of implementation.	Disagree, the intention of Para 3.3 is to highlight the importance of site appraisals in the round rather than in specific context of heritage assets.	No action required.
TDS_11	Historic England (Michael Stubbs)	Section 4 - Commerce and Industry	Not stated	One additional key design requirement is recommended here to address and enhance the setting of riverside and port facilities to improve the relationship with affected listed buildings, conservation areas and scheduled monuments. The adopted Core Strategy deals with opportunities to enhance the setting of Tilbury Fort and Coalhouse Fort. We recommend similar guidance is added to this section.	Agree.	Review text in Section 4 relating to Commerce and Industry and ensure that appropriate reference is made to mitigating any potential impact on heritage assets.

Comment ID	Consultee	Consultation Point	Comment Type	Comment justification and suggested changes	Officer Response:	Proposed Actions:
TDS_12	Intu Lakeside (Marc Myers) Via Nathaniel Lichfield & Partners (Stephanie Walker)	Paragraph 1.6-1.7	Disagree	Intu shares the Council's view of the importance of achieving good design set out in the Design Strategy SPD. The recognised link between good design outcomes and achieving corporate and community priorities is also supported. In particular here, recognition by the Council of the role of design encouraging and promoting job creation and economic prosperity is supported. We consider the objectives listed at paragraphs 1.6 and 1.7 should be revised to more directly reflect this. In terms of other objectives, Intu welcomes the commitment of the Council working proactively with the development industry. Intu looks forward to continuing to work in consultation with the Council on design development for proposals.	Corporate and community objectives are high level and provide context for the Design Strategy Objectives.	No action required.
TDS_13	Intu Lakeside (Marc Myers) Via Nathaniel Lichfield & Partners (Stephanie Walker)	Paragraph 1.9	Disagree	The tenor of the comment at paragraph 1.9 about refusing schemes which do not reflect its design quality aspirations for the Borough is understood; however the terminology used is considered inappropriate in a policy document and should be removed. Planning decisions must be taken in accordance with the development plan unless material considerations indicate otherwise (i.e. P3/10 11135870v1 weighing up the planning balance). This document will supplement design policies in the Local Plan and its role as such should be made clear within this introduction.	The wording is aimed to emphasise the importance of design as a key material consideration which is often otherwise underappreciated in practice when balances against other wider planning objectives.	No action required.
TDS_14	Intu Lakeside (Marc Myers) Via Nathaniel Lichfield & Partners (Stephanie Walker)	Paragraph 1.10	Agree	Intu supports the non-prescriptive approach to the Design Strategy referred to at Paragraph 1.10 which states that the design strategy does not establish a rigid blueprint but a framework within which well-designed proposals can be shaped and assessed. This is considered an important element of encouraging good design without risking frustrating development.	Comment noted.	No action required.
TDS_15	Intu Lakeside (Marc Myers) Via Nathaniel Lichfield & Partners (Stephanie Walker)	Section 4	Agree	Intu also welcomes the use of place typologies and recognition of Thurrock Lakeside as a distinct typology area within the Borough.	Comment noted.	No action required.
TDS_16	Intu Lakeside (Marc Myers) Via Nathaniel Lichfield & Partners (Stephanie Walker)	Section 3	Disagree	In Section 3.0 designing in context the four main considerations in preparing a site appraisal provides a helpful guide to approaching design, although it should be noted that there are many other factors that might be drawn into any such appraisal and inform an appropriate design response and this should be acknowledged explicitly.	Disagree, the site appraisal considerations are not aimed to provide exclusive or exhaustive assessment criteria.	No action required.

Comment ID	Consultee	Consultation Point	Comment Type	Comment justification and suggested changes	Officer Response:	Proposed Actions:
TDS_17	Intu Lakeside (Marc Myers) Via Nathaniel Lichfield & Partners (Stephanie Walker))	Section 4 - Lakeside	Agree	In terms of the Lakeside Typology Area in Section 4.0. Intu supports the recognition of Lakeside as having significant growth and development potential. The aspirations for Lakeside, as detailed in the design strategy SPD, such as the mix of uses, public realm improvements, bringing development down to the lake front, and place making are appropriate and have guided the design development of proposals which have already obtained planning permission.	Support noted.	No action required.
TDS_18	Janet McCheyne	Full Document	Agree	I agree with the principle, but feel some details need expanding. Change 1: "Development layouts will be expected to be formed to a pattern, character and appearance that is related to the existing settlement" Please can development in rural areas to more distinctly rural: some new builds or extensions have resulted in incongruous town houses. 3 storey dwellings are not appropriate in most village settings; roofs should not be higher than surrounding buildings. Change 2: Inappropriate boundaries for village locations should also mention railings and metal electronic gates which urbanise the environment and are to the detriment of community ethos.	Support noted. Agree that some of the details in the Design Strategy could be expanded, however, the suggested changes could potentially make the document inflexible and no longer fit for purpose. The emphasis the document places on the need to design in context should ensure that new developments in rural areas are designed in an appropriate and sympathetic way.	Review document and add additional detail to explain key points and improve clarity.
TDS_19	Cogent land LLP Via Icen Projects Ltd (Paul Drew)	Full Document	Not stated	Cogent Land LLP specialises in sustainable development and strategic land. It has secured development plan allocations and planning permissions for major development sites across the UK. Cogent has an established and extensive presence in the Thurrock area, with a strong and committed focus on the potential for sustainable growth and regeneration. Several notable schemes in Thurrock include: Ponds Farm – this site has planning permission for 38,686sqm (416,416 sq. ft.) of employment floor space. When constructed this site will make provision for approximately 900 new jobs; Williamson Farm, Corringham – a planning application was submitted in March 2015. Proposals include the provision of 750 homes; a new railway station; a secondary school; flood mitigation area, and supporting infrastructure; Bata Field, East Tilbury – planning permission was granted for 299 homes. This scheme is currently under construction and is positioned a short-distance from the Lower Thames Crossing routes; and, Land to the west of East Tilbury – a planning application is due to be submitted imminently for the provision of 1,000 homes; primary school; vehicular bridge crossing; and supporting infrastructure. This site is adjacent to the Lower Thames Crossing routes.	Comment noted.	No action required.

Comment ID	Consultee	Consultation Point	Comment Type	Comment justification and suggested changes	Officer Response:	Proposed Actions:
TDS_20	Cogent land LLP Via Icen Projects Ltd (Paul Drew)	Full Document	Not stated	The draft SPD recognises that achieving good design is important and a benefit in the delivery of more sustainable development and communities. The SPD could further embody the NPPF, for example, the NPPF at section 7.56 states - "Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people". Section 7.57 continues - "It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes". Thurrock could reinforce these principles of promoting good design outcomes when delivering development proposals across the Borough. The SPD will then strengthen the delivery of good design.	Comment noted. The Design Strategy already makes reference to national policy, additional references are not deemed necessary as the NPPF already forms part of the Development Plan and is a key consideration in the determination of planning applications.	No action required.
TDS_21	Cogent land LLP Via Icen Projects Ltd (Paul Drew)	Full Document	Not stated	The draft SPD has a good structure including a useful Section 3 (Designing in Context) which identifies key design considerations and summarises them into questions that Thurrock Council expect to be addressed as part of any site appraisal. Also Section 5 (The Development Process) provides good guidance on the progression of proposals from pre-application stage to post-application and monitoring. There is a good foundation in design policy which provides a sound design quality policy trail. But as above, the cross reference to NPPF could be stronger. In particular, the central premise of "presumption in favour of sustainable development". Although definitions of this are still being resolved, reference to it and any agreed interpretation would help throughout the SPD in particular part D of Section 3 - Building in Sustainability. Where clearer guidance would help is in Section 3 - Designing on Context and Section 4 - Place Typologies in Thurrock. The issue of character is introduced in Section 2 – The Importance of Good Design (subsection 'Understanding the Character of Thurrock'). Paragraph 2.22 notes the sharp contrast between the ancient and the modern, the man-made and the natural. It would help the SPD as a framework if this point was further carried over into Sections 3 and 4. In particular Section 4 on typologies should add further references to the juxtaposition of the ancient and the modern, the man-made and the natural. It is clear the SPD is trying to balance a Thurrock-wide sense of planned order but at the same time be sympathetic to economic-based development ideas that may challenge it. It is possible that planning officers will struggle with this balance. For example, the assessment of character – and critically judging where proposals do not meet expectations of responding to character – allows for a great deal of interpretation. Page 17,	Support noted. Agree that some of the details in the Design Strategy could be expanded upon to provide clarity and ensure consistency.	Review document and add additional detail to explain key points and improve clarity.

Comment ID	Consultee	Consultation Point	Comment Type	Comment justification and suggested changes	Officer Response:	Proposed Actions:
				<p>paragraph 2.25 in a case in point states: “Good design makes the most of what is already valued, and contributes to a sense of place by providing sustainable multiple benefits to the development and the surrounding area. Where a proposal cannot meet the expectations of character policies, a proposal may be refused or additional changes on site or off site, will be sought to reduce or compensate for the shortfall”. It could be possible for a planning officer to interpret this as support for rejecting designs that on the contrary may have the potential to be successful. Memorable schemes such as the Rainham Marshes RSPB visitor centre, or historically, the Bata shoe factory at East Tilbury might never have been allowed with such guidance.</p> <p>Perhaps the SPD could go further. Along with robust site appraisals, a further qualification could include a comment regarding interventions that challenge the established character of a place by imposing development in the landscape, must require exceptional design standards.</p>		
TDS_22	Cogent land LLP Via Icen Projects Ltd (Paul Drew)	Section 4 - Village Locations	Not stated	<p>Currently the SPD expects little change within Villages described in Typology Five, stating that “Proposals coming forward within these locations are likely to be more limited to include small scale infill and redevelopment proposals within the defined development boundaries of existing settlements”. However, some villages could provide the opportunity to make better use of under patronised railway stations. How will a planning officer interpret the conflict between modest proposals as expected in Typology Five – Village Locations (page 60), and the need sustainable transport, as referenced in Typology Two, stating: “Proximity to substantial rail and road infrastructure is a critical part of the design and layout of development as part of a residential neighbourhood”. Some small villages are extensively supported by rail infrastructure but are not considered by Typology Two, as they are too small to be classed as Residential Neighbourhoods. A planning officer will need more certainty as to whether a proposal is sustainable because it</p>	<p>The map indicating the broad typology areas shows that all settlements/locations that are adjacent to railway stations should be defined as either typology 1 or typology 2. As such, this comment is considered invalid.</p>	No action required.



Comment ID	Consultee	Consultation Point	Comment Type	Comment justification and suggested changes	Officer Response:	Proposed Actions:
				makes the best use of rail infrastructure or whether a village with this opportunity should not grow.		
TDS_23	Cogent land LLP Via Icen Projects Ltd (Paul Drew)	Paragraph 3.48	Not stated	The expectation of design elements to be included in proposals to raise quality is welcomed. However, some of the elements suggested may be challenging when assessed for adoption. An example is the requirement for street trees in paragraph 3.48. Whilst this addition is considered positive, Cogent would like to seek reassurances that the requirements of the Design Strategy SPD have been consulted on and have adoption officer's approval. It is not uncommon for a policy framework to be agreed only to find subsequent proposals that comply are not acceptable by adoption officers.	Agree, in part. Some of the language used within the Design Strategy is too prescriptive and should be amended before adoption.	Review document and ensure that the guidance meets the criteria for Supplementary Planning Documents set out in the National Planning Policy Framework.
TDS_24	Cogent land LLP Via Icen Projects Ltd (Paul Drew)	Full Document	Not stated	It has been identified that some use of specific language on occasion confuses the overall message and therefore diminishes the significance of some points. For example, the word 'should' is used frequently in instances when the main point is to urge a quantifiable assessment. Other instances of language use include stating that proposals must accord with a certain criteria 'where appropriate' and that proposals must provide an 'adequate' provision of something. These words are used without qualification, and therefore do not strengthen the overall message of the SPD, particularly in relation to specific design considerations. Further to this, the use of generic jargon such as seeking 'design quality that raises the bar' does not contribute to the specific guidelines expected of a design SPD, against which to measure proposals. The SPD also includes some individual typographical and spelling errors, as follows: Page 17, paragraph 2.24: implies that South Ockendon is a river side settlement; Page 20, paragraph 3.7: 'features of the Borough'; and Page 22, paragraph 3.15: refers to an unqualified 'Place Check', which could be explained in the glossary. As a general comment, the guidance should avoid ambiguous aspirational statements, jargon and also define key technical	Agree, in part. The language within the document needs to make clear what is required of developers and what we encourage/promote and support as good practice. The word require should only be used where a statement is directly linked to policies within the Core Strategy and/or does not place add unnecessarily to the financial burdens on development.	Review document and ensure that the language used is consistent and appropriate in the context of the Core Strategy and National Policy.

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				terms to ensure the SPD is as useful as possible to all parties.		
TDS_25	Cogent land LLP Via Icen Projects Ltd (Paul Drew)	Full Document	Not stated	The Design Strategy SPD provides a good foundation for improving and enhancing the Borough's natural, built and historic environment. It could be made all the more robust as a tool to assist both design teams when producing proposals and case officers when assessing them to ensure that the Design Strategy accords with the aims of Thurrock Council to substantially raise design standards across the Borough. Central to this is ensuring that that all opportunities to cross reference to sustainable development contained within national policy in the form of the NPPF are taken, the classifications of typologies do not restrict sustainable growth, and that specific language is able to be qualified, with generalisations being avoided. In conclusion, with the suggested changes outlined above, Cogent Land LLP welcome this design guidance and are committed to raising the standard of design throughout Thurrock. We trust you find this consultation response helpful and look forward to working alongside Thurrock Council and other stakeholders in developing a robust Design Strategy SPD.	Comments noted.	Review document and ensure that the language used is consistent and appropriate in the context of the Core Strategy and National Policy.

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TDS_26	Keepmoat Homes (South) Via Urbanissta (Jo Hanslip)	Full Document	Not stated	<p>Urbanissta Ltd has been instructed by Keepmoat South to submit representations to the Thurrock Council Design Strategy Consultation. Keepmoat has an interest in the Site that is located at the Former Treetops School site at Dell Road, Grays. They also have an interest in land that has been advertised as the Corner Site, which is located on the corner of Dell Road with Orsett Road. The Treetops site is the subject of a planning application and is shown at Appendix 1 to these representations. Representations are made on a number of specific points: • Paragraph 1.11 • Policy B5 • Paragraph 3.37 • Paragraph 3.48 • Section D - Building in Sustainability • Paragraph 3.60 • D3 - Sustainable Drainage • Paragraph 4.18 • Typology 5 point 3 • Paragraph 5.5 • Paragraph 5.6 • Paragraph 5.16</p> <p>Representations in relation to each of the above points will be dealt with separately below. Overall, it is considered that the Design Strategy is in instances negative in its drafting and there are concerns that it has an inflexible and restrictive approach to design may impact upon the prospects of securing the timely and effective delivery of new development.</p>	Comments noted. It is recognised that the language within the document needs to make clear what is required of developers and what we encourage/promote and support as good practice. The word require should only be used where a statement is directly linked to policies within the Core Strategy and/or does not place add unnecessarily to the financial burdens on development.	Review document and ensure that the language used is consistent and appropriate in the context of the Core Strategy and National Policy.
TDS_27	Keepmoat Homes (South) Via Urbanissta (Jo Hanslip)	Paragraph 1.11	Not stated	<p>Providing guidance on the design process having regard to the context of a site, ensuring that proposals are embedded within an understanding of place and thereby avoiding anonymous, 'off-the-peg' schemes is considered overly prescriptive in terms of the manner in which the design process should take place. The design process needs to have regard to the site and it's surroundings and context, this includes architectural content. The design of new development needs to acknowledge respect and respond positively to surrounding development, but it also needs to be buildable and saleable. Standard housing product can in many instances provide a good design solution for a site and as such should not be 'ruled out' by the Design Strategy.</p> <p>Paragraph 1.11 should provide suitably flexibility to enable all types of development to be considered on site where this responds and relates favourably to the local vernacular.</p>	Disagree, if it can be demonstrated by an applicant that a standard house typology is the most appropriate design in the context of an individual site then it will satisfy the conditions of Para 1.11. It should also be noted that Para 1.11 does not seek to impose a particular architectural style and could also be applied to layout issues such as ensuring that a dwelling appropriately addresses a corner.	No action required.
TDS_28	Keepmoat Homes (South) Via Urbanissta (Jo Hanslip)	Objective B5	Not stated	<p>Objective B5 seeks to identify and incorporate green infrastructure, existing open spaces and wider networks as part of a robust landscape framework. Whilst landscape is a significant component of any development proposal, the objectives of Policy B5 are slightly misleading, as it is not always possible for development to provide open spaces that link into and create wider open space networks, particularly where they form part of the urban area. Clearly where such opportunities are possible these will be included within the design rationale and review for a site, however such objective cannot be</p>	Agree. The language used within Objective B5 could be amended to make it clearer what is expected of developers and recognise that on smaller sites it may not be practical or appropriate to include open space on site.	Review Objective B5 and amend where appropriate.



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				considered to be a 'requirement' of development as they might not always be appropriate or possible in some developments. Greater clarity is required within the Design Strategy in relation to this matter.		
TDS_29	Keepmoat Homes (South) Via Urbanissta (Jo Hanslip)	Paragraph 3.37	Not stated	Paragraph 3.37 states that the Council will reject proposals that have not fully considered the importance of open space. Paragraph 3.37 is negative in its drafting. It is not appropriate for this Design Strategy to be setting out the cases for refusing development, it is the role of the development plan which would set out that there are alternative approaches to open space provision including commuted sums.	Agree, in part. The language used within Objective B5 could be amended to make it clearer what is expected of developers and recognise that on smaller sites it may not be practical or appropriate to include open space on site. It should be noted that the role of a Supplementary Planning Document is to provide additional guidance on the implementation of policy which includes national policy as well as policies within the Core Strategy, where appropriate this can include setting out reasons for refusal.	Review Objective B5 and amend where appropriate.
TDS_30	Keepmoat Homes (South) Via Urbanissta (Jo Hanslip)	Paragraph 3.48	Not stated	Paragraph 3.48 states that: "Thurrock Council will also require street trees to be incorporated as part of the hierarchy of streets in all developments". The requirement for street trees in all development is considered too prescriptive, as there may be instances where the provision of street trees is not possible for highways or other technical reasons. The Design Strategy should seek to encourage such opportunities where site circumstances and constraints allow. The requirement for street trees in new development would need to be considered in the context of the overall management of the site as well as overall siting of development in relation to the location of visibility splays, drives and front/back gardens.	Comments noted. It is recognised that the language within the document needs to make clear what is required of developers and what we encourage/promote and support as good practice. The word require should only be used where a statement is directly linked to policies within the Core Strategy and/or does not place add unnecessarily to the financial burdens on development.	Review document and ensure that the language used is consistent and appropriate in the context of the Core Strategy and National Policy.
TDS_31	Keepmoat Homes (South) Via Urbanissta (Jo Hanslip)	Section 3 - Part D	Not stated	Section D of the Design Strategy sets out the Council's preferred approach for sustainable design in new buildings. The Design Guide should reflect the Council's approach to the optional technical standards in light of the National Housing Review 2015. Policies within the Core Strategy Focused Review relating to water and energy efficiency are to be interpreted by reference to the nearest national equivalent standard. In conjunction with the Local Plan, the Design Strategy can assist in clarifying the Council's preferred approach to relevant standards to ensure	Comment Noted. The Design Strategy cannot introduce new policies. Adoption of the Optional Technical Standards will be explored as part of ongoing work on the emerging Local Plan.	No action required.

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				that development complies from the outset.		
TDS_32	Keepmoat Homes (South) Via Urbanissta (Jo Hanslip)	Paragraph 3.60	Not stated	Paragraph 3.60 sets out that a site appraisal will identify opportunities for on-site energy to be provided as part of proposals and that sites may be able to be development with their own heat and power system. The potential for combined heat and power would need to be assessed on its own merits in the context of the site size, overall applicability, viability of such uses and the relationship with existing and proposed adjacent uses in terms of noise and impact on amenity. These considerations should be set out clearly within Strategy.	Agree, in part. The language used within Objective D2 could be amended to make it clearer what is expected of developer/applicant.	Review Objective D2 and amend where appropriate.
TDS_33	Keepmoat Homes (South) Via Urbanissta (Jo Hanslip)	Paragraph 3.63	Not stated	Paragraph 3.63 states that site assessments will reveal the scope for integrating SUDs into development. Paragraph 3.63 should be amended to include reference to circumstances where underlying ground conditions would also mean that SUDS are not a suitable means of dealing with flood risk and that alternative methods for dealing with flood risk could be adopted.	Disagree, Paragraph 3.63 indicates that applicants should assess the potential it does not require the use of sustainable drainage measures. As such it is flexible enough to respond to concerns raised.	No action required.
TDS_34	Keepmoat Homes (South) Via Urbanissta (Jo Hanslip)	Section 4 - Residential Neighbourhoods	Not stated	Point 5 "Thurrock Council will expect proposals for Residential Neighbourhoods to incorporate a number of character areas differentiating one location from another with the number of character areas and this is dependent on context and the size of the scheme being proposed." In this case, it is considered that the Council would need to set out the size and scale of development that is applicable for providing character areas.	Disagree, a residential neighbourhood could consist of several smaller sites with each contributing towards the wider character of the neighbourhood.	No action required.
TDS_35	Keepmoat Homes (South) Via Urbanissta (Jo Hanslip)	Section 4 - Village Locations	Not stated	In identifying the village typology the Design Strategy states that: Proposals coming forward within these locations are likely to be more limited to include small scale infill and redevelopment proposals. It is not considered appropriate for this Design Strategy to be advocating the spatial approach to development in Thurrock, this is the role of the Local Plan which will set out the Spatial Strategy. Depending upon the strategy, village extensions may be a suitable approach to housing delivery. This Design Guide is therefore prejudicing the Spatial Strategy of the Local plan and should be removed. Paragraph 4.18 would need to be deleted, as it is not the role of the Design Strategy to identify the size and scale of development.	Agree that it is not appropriate for the Design Strategy to dictate the spatial strategy. However, the statement made in relation to village locations reinforces the spatial strategy set out in the Core Strategy.	No action required.

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TDS_36	Keepmoat Homes (South) Via Urbanissta (Jo Hanslip)	Section 4 - Village Locations	Not stated	In setting out the key design requirement for village locations, the guide advocates a contemporary interpretation of character within village locations. Contemporary design is not always the most appropriate approach in new development particularly within village locations where there is a greater relationship with local rural architectural characteristics. For example in the context of a Conservation Area or a landscaped area, it might be that a more traditional design style would related better to existing development. Again, we object to the prescriptive approach being applied to village development within the Design Strategy and suggest that a more open and flexible approach to the design solution for a sit being determine in a site-by-site, case-by-case basis. Point 3 of the design requirements for village locations should be amended to reflect that contemporary interpretation of character would need to be considered in the context of the overall site and its location and that traditional styles may also remain appropriate design solutions.	Agree that contemporary design may not always be the most appropriate solution but the wording within point 3 is clear that contemporary design is encouraged not required.	No action required.
TDS_37	Keepmoat Homes (South) Via Urbanissta (Jo Hanslip)	Paragraph 5.5-5.6	Not stated	<p>The Design Strategy sets out that a Design Review may assess 'larger scale' projects. The Design Strategy should ideally provide greater clarify as to the framework for the Design Review as this can have implications on project cost and timescales for bringing forward development proposals. It would also be advantageous if a 'major project' or 'larger scale' project was defined and the criteria identified that would trigger a development to be taken to Design Review Panel.</p> <p>The Design Strategy should include more detailed information regarding the Design Review Panel.</p>	Agree, in part. It is appreciated that more information on the design review process would be useful however including additional information within the document may date the document if the process changes.	Include a reference to information about design reviews on Council's website in the text.
TDS_38	Keepmoat Homes (South) Via Urbanissta (Jo Hanslip)	Paragraph 5.16	Not stated	Paragraph 5.16 of the Design Strategy states: "Thurrock Council will resist subsequent proposals for minor amendments or to vary extant permissions or conditions that are likely to undermine their design quality." We would object to the Council's approach to restricting the use of minor amendments in planning applications. The Council are applying an inflexible approach to overall development proposals which may impact upon development coming forward, and this paragraph should be more positive in its drafting and not seek to compromise an established element of the planning process – in securing minor or minor material amendments to previously consented schemes. There may be instances, for example an outline development, where minor amendments may be required to improve the overall siting of development or amend the palette of materials that are more agreeable to the local context.	Disagree, the intention of para 5.16 is to resist minor amendments that reduce the design quality of a scheme. As explained in your comment not all minor amendments will result in a loss of quality and these types of amendments would still be deemed acceptable.	No action required.

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TDS_39	Keepmoat Homes (South) Via Urbanissta (Jo Hanslip)	Full Document	Not stated	<p>Keepmoat have serious concerns that the Design Strategy in its current format is too negative in it's drafting and in instances, overly prescriptive. This may have consequences on the ability of development proposals to come forward in a timely manner. Keepmoat would request that the Council revisit specific sections on open space, the use of SUDS, on site heat and power networks and street trees. Currently, the Council have applied an inflexible approach to on site infrastructure but it is considered that these points are reviewed with the strategy setting out alternative approaches to the provision of these types of infrastructure as in some cases it is not possible to provide these on site. The Council should also set out within this Design Strategy, their approach to the implementation of the relevant Building Regulation Standards. The Design Strategy should also be revisited to include more details on the framework for requirement to attend Design Review Panel, as there is currently no information on thresholds, types or scale of developments to which such an obligation will be imposed. Attendance at a Design Review Panel will have cost and timescale implications for developers and will impact upon the delivery of development within the Borough. Thurrock Council has suffered from low levels of housing delivery for a number of years and viability restrictions constraint the delivery of many sites within the Council's administrative area. Any proposals, which seek to further constraint or control development have the potential to impact upon delivery and/or result in additional costs being borne by developments. This risks further delays to the delivery of much needed housing in Thurrock. The Design Strategy should be reviewed to ensure that whilst establishing a framework for ensuring good design within the Thurrock area, it is also positively prepared and drafted so as to support and encourage new developments to be brought forward within the Borough. As currently prepared, it is not considered that the Design Strategy has the balance quite right and as such we consider the document should be amended as detailed in our representations above.</p>	<p>Agree, in part. Some of the language used within the Design Strategy could be amended to improve clarity and worded in a more positive way. With regards to including additional information on the design review process and building regulations the document will be amended to signpost information on the Council's website. Design reviews are encouraged through the National Planning Policy Framework as such the requirement for significant development proposals to be assessed against this process remains valid.</p>	<p>Review document and ensure that the language used is consistent and appropriate in the context of the Core Strategy and National Policy.</p>

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TDS_40	Persimmon Homes Essex (Anna Davies)	Full Document	Not stated	<p>Persimmon Homes is a FTSE 100 house builder with a national presence. Persimmon Homes has a strong commitment to Thurrock and welcomes the opportunity to comment on Thurrock's Draft Design Strategy SPD. Paragraph 1.10 of the document states that the Design Strategy will be used as a "tool to inform and assess proposals within existing locations, at all scales, from small infill sites through to larger regeneration and redevelopment schemes. It will also be used on new comprehensive development sites and master planning projects as and when they come forward within the Borough. It does not establish a rigid blueprint but a framework within which well-designed proposals can be shaped and assessed". Having regard to the above, the Design Strategy SPD is intended to be used in advance of the production and adoption of the new Local Plan for Thurrock, which is timetabled for adoption in 2020. There are areas of conflict and contradiction between Thurrock's Draft Design Strategy SPD (2016) and the adopted Development Plan, namely the Thurrock LDF Core Strategy (2011). Furthermore, in certain instances it is not clear that what is advocated, and in some instances prescribed, in the Thurrock's Draft Design Strategy SPD would allow development to accord with adopted development plan policies. It is not clear in some instances the Policy basis for what is being sought within the SPD. The conflict and contradiction between Policy documents is unhelpful, confusing and needs to be addressed. The SPD should not seek to (a) re-write policy, (b) seek to set standards at odds with policy (c) have the effect of rendering development incapable of meeting adopted policy, (d) render development unviable. Statute is clear regarding the primacy of the development plan and the SPD needs to be reviewed in light of this; - Section 70(2) of the Town and Country Planning Act 1990 obliges the decision maker to have regards to the provision of the development plan, so far as material to the application, and to any other material consideration. - Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that, if regard is to be had to the development plan for the purposes of any determination under the planning acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise. The SPD should be consistent with the principles and policies set out in the Adopted Development Plan, the LDF Core Strategy (2011). Para 028 of the Planning Practice Guidance makes clear that 'They [SPD's] should build upon and provide more detailed advice or guidance on the policies in the Local Plan. They should not add unnecessarily to the financial burdens on development'. Para</p>	<p>Comments noted. The Design Strategy is intended to guide applicants on the implementation of policies within the Core Strategy including Policy PMD2. It is recognised that the language within the document could be improved to make clear what is required of developers and what we encourage/promote and support as good practice. With the word require used only where a statement is directly linked to policies within the Core Strategy and/or does not place add unnecessarily to the financial burdens on development. In determining if financial implications are unnecessary the Council will consider policies within the national policies and guidance and the Core Strategy.</p>	<p>Review document and ensure that the language used is consistent and appropriate in the context of the Core Strategy and national policy.</p>



Comment ID	Consultee	Consultation Point	Comment Type	Comment justification and suggested changes	Officer Response:	Proposed Actions:
				<p>153 of the Planning Practice Guidance (Plan Making – Local Plans) warns Local Authorities not to use SPD’s to add unnecessarily to the financial burdens on development. ‘Para 153 - Each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances. Any additional development plan documents should only be used where clearly justified. Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development’. Whilst we are supportive of achieving good design, we are concerned that the SPD seeks to place additional costs on development in the Borough. Furthermore, that there has been no assessment of the impact of such measures both individually or cumulatively. Additional costs would impact development viability, deter investment and delivery. Thurrock has a significant shortage in housing when measured against housing targets. In certain instances, the draft SPD is highlighting or referring to documents that formed the evidence based for the LDF Core Strategy which themselves are out of date. This is particularly the case in terms of open space assessment, Green Grid and Green Infrastructure. Furthermore, such documents fail to satisfactorily identify open space requirements and what strategic allocations are identified to deliver in terms of GI. Whilst Persimmon Homes welcome the production of the draft SPD, presently we have concerns regarding lack of consistency with the adopted development plan policies and the, prima facie, lack of consideration of and potential impact upon development viability. Notwithstanding the above, it is not clear as to the timescale for the proposed introduction of this document. Furthermore, whether it will be used from the period of adoption and if so, whether it will apply to schemes pending determination. Upon adoption it would be considered unreasonable to seek to apply this document to schemes that have been submitted or are in the later stages of pre-application discussion. Furthermore, purchasing decisions and options are often taken out on sites significantly before planning applications are advanced. It would seem reasonable to only introduce such guidance after providing an advanced period of notice.</p>		

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TDS_41	Persimmon Homes Essex (Anna Davies)	Paragraph 3.14	Not stated	Paragraph 3.14 seeks to create new and improved green spaces within development proposals. The requirement does not stipulate a standard or quantum that the Council will seek to achieve and as such is vague and not helpful. The Council does not have a clear standard which it applies. The standard contained in the Thurrock Local Plan (1997) Annex would not allow for the densities of development prescribed within the LDF Core Strategy (2011).	Comments noted. The Council is currently in the process of preparing its Active Place Strategy which looks at needs for open space, pitch, and built leisure facilities across the borough. Once finalised, piece of work will inform policies within the emerging Local Plan and future Supplementary Planning Documents.	No action required.
TDS_42	Persimmon Homes Essex (Anna Davies)	Paragraph 3.10	Not stated	The Design Strategy SPD seeks to “ensure that the Borough’s biodiversity and habitats are protected and enhanced’. This requirement goes beyond the test in the NPPF, paragraph 109 stating “the planning system should contribute to and enhance the natural and local environment by minimising the impacts on biodiversity and providing net gains in biodiversity where possible”. There is no justification within the document for applying a higher threshold than the NPPF.	Comments noted. The Council does not consider the phrasing used in paragraph 3.10 to exceed the threshold stipulated in the National Planning Policy Framework.	No action required.
TDS_43	Persimmon Homes Essex (Anna Davies)	Paragraph 3.15	Not stated	Paragraph 3.15 requires applications to appraise how proposals can work with existing site features and incorporate them into the green infrastructure that forms a robust landscape framework. Persimmon Homes notes that the Council’s evidence base in relation to Green Infrastructure is; a) outdated, b) confusing in so much that there is a variety of Green Grid documents that have contradictory proposals and c) does not explain what will be sought, practically with regards to off-site works. The Council must ensure that the evidence base used to support the SPD document and the emerging Local Plan is up to date. This is a key requirement of paragraph 158 of the NPPF which states that “each local planning authority should ensure that the Local Plan is based on adequate, up to date and relevant evidence about the economic, social and environmental characteristics and prospects of the area”. In terms of the bullets under para 3.15, one way in which GI is to be achieved is through the delivery of SUDs and water attenuation. It should be recognised that SUDs are not always achievable, particularly on brownfield sites.	Comments noted. The Design Strategy is intended to guide applicants on the implementation of policies within the Core Strategy and should be read alongside other key documents and evidence. The Council is currently in the process of updating its evidence when finalised these documents will be made available on the Council's website. With regards to the use of sustainable drainage systems, Paragraph 3.63 indicates that applicants should assess the potential it does not require the use of sustainable drainage measures. As such it is flexible enough to respond to concerns raised.	No action required.

Comment ID	Consultee	Consultation Point	Comment Type	Comment justification and suggested changes	Officer Response:	Proposed Actions:
TDS_44	Persimmon Homes Essex (Anna Davies)	Paragraph 3.20	Not stated	Paragraph 3.20 seeks proposals to have regard to the prevailing density of an area. Policy CSTP1 of the adopted Core Strategy (2011) prescribes density ranges for new development. The Design Strategy should have regard for these and direct the developer to this policy (see above comments regarding consistency with development plan policies). Paragraph 17 of the NPPF encourages the effective use of land. Whilst this relates to brownfield development, the same approach should be adopted for greenfield sites. This requirement could result in an inefficient use of land, purely on the basis that surrounding development is of a low density. The appropriate density should be informed by the development plan policies. Clearly there is a role for pre-application discussions between the developer and the Council to ensure that paragraph 17 is adhered to.	Agree. Paragraph 3.20 could be expanded to include other aspects that should be considered when determining an appropriate density for a site including aspects such as accessibility and the need to make efficient use of land.	Amend paragraph 3.20 to make reference to other factors that can influence site density.
TDS_45	Persimmon Homes Essex (Anna Davies)	Paragraph.3.2 2	Not stated	Paragraph 3.22 refers to 'raising the bar' for design quality in areas that have a 'less distinct' or 'attractive character'. It is not clear what is meant by 'less distinct', less distinct that what? The test for proposals should be about whether the scheme is a 'high quality design' in line with paragraph 17 of the NPPF. The terminology used in the draft Design Strategy would suggest that the design quality would always need to increase from development to development. This is unduly onerous, allows for the shifting of goal posts and may render development unviable.	Agree, in part. The intention of this paragraph is to ensure that new developments in areas of poor and unattractive design promote a higher design quality than the surrounding area.	Amend paragraph 3.22 to ensure that the intention of the paragraph and the implications for development proposals are clear.
TDS_46	Persimmon Homes Essex (Anna Davies)	Page 28	Not stated	Page 28 of the document describes 'a typical residential neighbourhood'. It is not clear of these 6 points relate to schemes which have been delivered in the borough or whether they are aspirations. We have the following issues: 1. The quantum and type of open space sought is not detailed either in this document or elsewhere in the development plan. 2. The majority of sites identified in the LDF-CS do not overlook the waterside. This is not a typical residential neighbourhood. 3. This point lacks clarity. It needs to recognise that parking is needed and will have an impact on appearance. 5. It should be recognised that the introduction of commercial uses may not be appropriate having regard to; a) location, b) demand and c) viability. There is no Policy support in the LDF-CS requiring the introduction of live / work or mixed use development on residentially allocated sites. 6. The term 'variety of houses' needs further explanation. Does it relate to housing mix, tenure or design?	Comments noted. The image shown is a well designed residential neighbourhood and represents what could be delivered in the borough. The annotation is not intended to be a description of what a typical residential neighbourhood is it is a way of communicating visually how some of the aspects set out in the strategy can be interpreted. However, it is appreciated that this is not necessarily made clear by the title of the image.	Review diagram captions and ensure that the new phrasing highlights the fact that the image is an example of what can be achieved.



Comment ID	Consultee	Consultation Point	Comment Type	Comment justification and suggested changes	Officer Response:	Proposed Actions:
TDS_47	Persimmon Homes Essex (Anna Davies)	Paragraph 3.37	Not stated	Paragraph 3.37 states that it will reject proposals that have not fully considered the importance of open space as an integral part of the development layout. This reads like a policy but provides no basis for making this statement. What does 'fully considered' mean? As detailed above, there is a fundamental lack of guidance in relation to open space requirements both within this document, the development plan and associated evidence base.	Agree, in part. The language used within Objective B5 could be amended to make it clearer what is expected of developers and recognise that on smaller sites it may not be practical or appropriate to include open space on site. It should be noted that the role of a Supplementary Planning Document is to provide additional guidance on the implementation of policy which includes national policy as well as policies within the Core Strategy, where appropriate this can include setting out reasons for refusal.	Review Objective B5 and amend where appropriate.
TDS_48	Persimmon Homes Essex (Anna Davies)	Paragraph 3.48 and 3.56	Not stated	Paragraph 3.48 and 3.56 requires proposals to incorporate street trees as part of the hierarchy of streets in all developments and reduce the visual impact, particularly for on street parking provision or where substantial areas of car parking are required for a particular use or mix of uses. This requirement is too prescriptive and does not have regard to the sites circumstances and the ability of such an arrangement to achieve the density targets set out in the LDF-Core Strategy (2011).	Agree, in part. It is appreciated that street trees may not be appropriate in every circumstance but the onus is placed on the applicant to demonstrate this. Comments relating to the impact of street trees on density are deemed to be unfounded as there are plenty of examples across the country including Thurrock where street trees have been used in higher density schemes.	Review document and ensure that the language used is consistent and appropriate in the context of the Core Strategy and National Policy.
TDS_49	Persimmon Homes Essex (Anna Davies)	Section 3 - Part D	Not stated	Section D relates to sustainable design. The requirement for certain design features is not supported by adopted development plan policy and therefore can not be insisted upon. The need for sustainable design features must also have regard for the sites circumstances and adopted development plan policy.	Comments noted. It is recognised that the language within the document could be improved to make clear what is required of developers and what we encourage/promote and support as good practice. With the word require used only where a statement is directly linked to policies within the Core Strategy and/or does not place add unnecessarily to the financial burdens on development.	Review document and ensure that the language used is consistent and appropriate in the context of the Core Strategy and national policy.
TDS_50	Persimmon Homes Essex (Anna Davies)	Section 3	Not stated	This section sets out Thurrock Council's requirements regarding assessing the context of a site, including a checklist of key questions that need to be addressed as part of the design process. The section is illustrated with examples from within the Borough and elsewhere. Persimmon Homes has no comments on this section.	Comments noted.	No action required.

Comment ID	Consultee	Consultation Point	Comment Type	Comment justification and suggested changes	Officer Response:	Proposed Actions:
TDS_51	Persimmon Homes Essex (Anna Davies)	Section 4 - Urban Areas	Not stated	A typical secondary street is described as having street tree planting and wide pavements. See our comments in section 2 relating to street tree planting. The presence for wide pavements rules out shared surface streets. This is not necessary, unduly prescriptive and contrary to Manual for Street and the Essex Design Guide.	Comments noted. The image shown is a well designed secondary street and represents what could be delivered in the borough. The annotation is not intended to be a description of what a typical residential neighbourhood is it is a way of communicating visually how some of the aspects set out in the strategy can be interpreted. However, it is appreciated that this is not necessarily made clear by the title of the image.	Review diagram captions and ensure that the new phrasing highlights the fact that the image is an example of what can be achieved.
TDS_52	Persimmon Homes Essex (Anna Davies)	Section 4 - Residential Areas	Not stated	This section states that residential neighbourhood must provide a range of different housing reflecting local need, include a range of tenure and affordable homes. This is being prescriptive and needs to relate to development plan policies which support this approach. The draft Design Guide does not recognise that development viability can impact on tenure and affordability which is recognised and reflected in adopted policy. The requirement that a range of different housing 'must' be provided is to prescriptive and does not reflect national policy.	Comments noted. It is important that new housing schemes respond appropriately to local housing needs. The latest Strategic Housing Market Assessment indicates that there is a need for a mix of house types across the borough with the greatest need being for 2/3 bed terraced/town houses. The Design Strategy is simply reinforcing this message.	No action required.
TDS_53	Persimmon Homes Essex (Anna Davies)	Section 4 - Residential Areas	Not stated	A higher density development will be acceptable around locations with good public transport accessibility. What is meant by a higher density in this context? The document needs to have regard to Policy CSTP1 of the adopted Core Strategy (2011).	Policy CSTP1 indicates that new residential development should be led by the design standards set in a subsequent SPD and that in centres and areas of high public transport accessibility a minimum of 60dph will be sought. The Design Strategy SPD adds additional guidance around how the density of scheme should be determined but does not seek to propose specific targets.	Amend paragraph 3.20 to make reference to other factors that can influence site density.
TDS_54	Persimmon Homes Essex (Anna Davies)	Section 4 - Residential Areas	Not stated	A typical Tertiary Street is described as having 'parking discretely accommodated'. This is too vague and open to interpretation. The document should not rule out a range of parking typologies. If the document is advocating an approach, it would be useful to set out examples at the density ranges required in the LDF Core Strategy.	Comments noted. The image shown is a well designed tertiary street and represents what could be delivered in the borough. The annotation is not intended to be a description of what a typical residential neighbourhood is it is a way of communicating visually how some of the aspects set out in the strategy can be interpreted. However, it is appreciated that this is not necessarily made clear by the title of the image. Additional more specific	Review diagram captions and ensure that the new phrasing highlights the fact that the image is an example of what can be achieved.

Comment ID	Consultee	Consultation Point	Comment Type	Comment justification and suggested changes	Officer Response:	Proposed Actions:
					standards relating to parking provision and design will be consulted upon in 2017.	
TDS_55	Persimmon Homes Essex (Anna Davies)	Full Document	Not stated	The document does not have sufficient regard to development plan policies which should underpin the guidance. The document does not take the opportunity to address fundamental gaps in guidance in Thurrock, such as guidance on open space requirements. It refers to documents that are themselves out of date and do not provide effective guidance as to what is sought (see comments on GI and Green Grid as an example) It is not clear how the document, including the measures sought and prescriptions therein, has had regard to paragraph 173 and paragraph 174 of the NPPF and therefore can not be considered in conformity with national policy.	Comments noted. The Design Strategy is intended to guide applicants on the implementation of policies within the Core Strategy including Policy PMD2. It is recognised that the language within the document could be improved to make clear what is required of developers and what we encourage/promote and support as good practice. With the word require used only where a statement is directly linked to policies within the Core Strategy and/or does not place add unnecessarily to the financial burdens on development. In determining if financial implications are unnecessary the Council will consider policies within the national policies and guidance and the Core Strategy. With regards to references to specific evidence documents these will be replaced to make the document more flexible and response to emerging evidence as it is published.	Review document and ensure that the language used is consistent and appropriate in the context of the Core Strategy, national policy and emerging evidence.

**Response to Question 2**

Comment ID	Consultee Details	Response to question 2 - Do you feel that all the key cross boundary issues have been identified?	Officer Response	Officer Action Points
LPIO_178	Basildon Borough Council (Stephanie Kober)	<p>Basildon Borough Council are pleased to be consulted by Thurrock Council on their initial Issues and Options Consultation for the Thurrock new Local Plan. In particular, we are pleased to see that a list of Cross Boundary Issues has been identified within the consultation document, and that it is stated to be the intention of Thurrock Council to work with the other local planning authorities in South Essex, London and beyond in order to address them. Basildon Borough Council agrees with the list of Cross Boundary Issues identified, in particular the inclusion of the need to treat the accommodation needs of Gypsies and Travellers as a cross-boundary issue. As Thurrock Council will be aware, Basildon Borough Council has recently consulted on a Draft Local Plan where it indicated that it would not be possible to meet the needs of the large scale unauthorised encampment of travellers that were previously located at the Dale Farm site in Crays Hill within Basildon Borough. A site potential study prepared to identify suitable Gypsy and Traveller sites within Basildon Borough has failed to identify sufficient sites for such a purpose, resulting in the need for cross boundary cooperation on this matter. In relation to the other matters identified, it is agreed that these also require cross-boundary cooperation, and Basildon Borough Council is pleased to already be working closely with Thurrock Council and the other authorities in South Essex on the emerging Strategic Housing Market Assessment, and planned future work on an Economic Development Needs Assessment and a Strategic Retail Needs Assessment. It is anticipated that the ongoing work of the South Essex Strategic Planning Officers Group, and the recently formed South Essex Strategic Planning Members Group will ensure that the joint working arrangements already in place across South Essex are effective in dealing with the identified cross-boundary issues, ensuring that the local plans of the respective authorities are found to be sound and robust. It is however recognised that there may be instances where Thurrock Council and Basildon Borough Council will need to work together on specific matters arising from the immediate proximity of their areas to one another. We would be pleased to meet with you to discuss such matters if the need arises, as both Councils progress their plans to submission. I trust this response is of assistance to you in progressing your Local Plan. If, however you have any queries regarding the matters raised please do not hesitate to contact the planning policy team using the details provided at the top of this</p>	<p>Comments noted. The Council will continue to work closely with Basildon Council in promoting the proper strategic planning of South Essex through positive and ongoing engagement under the Duty to Cooperate. It should be noted that no evidence has been produced by Basildon to justify why Thurrock or any other neighbouring local authority should be required to accommodate the any part or Basildon's entire unmet Gypsy and Traveller needs requirements. Similarly, no evidence has been provided as to why Basildon cannot meet their own Objectively Assessed Gypsy and Traveller needs within their own administrative area.</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.</p>

Comment ID	Consultee Details	Response to question 2 - Do you feel that all the key cross boundary issues have been identified?	Officer Response	Officer Action Points
		letter.		
LPIO_145	Chelmsford City Council (Jeremy Potter)	I have the following Officer level comments: The commitment to seek to meet Thurrock's housing needs, within the Thurrock Councils boundaries is welcomed and the main cross-boundary issues related to Chelmsford are retail needs (Lakeside) and planning for strategic infrastructure (Lower Thames Crossing). The City Council look forward to continued engagement with Thurrock Council through the preparation of the Local Plan.	Comments noted. The Council is committed to engaging positively with neighbouring local authorities through the Duty to Cooperate process and it will ensure that appropriate arrangements are put in place to secure the active involvement of Chelmsford City Council in the Local Plan process.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_494	Daphne Revell	Movement by road, rail a must especially to get a lower Thames Crossing linking the A130 in Essex via Canvey area in a tunnel to cross to the M2 in Kent. This would open up an outer London ring road to all the ports on the East Coast - Hull Felixstowe, Ipswich, Immingham etc. & Dover & Folkestone. etc.	Comments noted. Until such time as the Government makes a decision on the Lower Thames Crossing it remains difficult for the Council to plan appropriately for the future development of Thurrock.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_142	Dartford Borough Council (Michael Clarkson)	Thurrock's Emerging Local Plan Cross-boundary retail matters are potentially significant in Thurrock and the wider area, particularly relating to the continuing regional role of Lakeside and its surrounding development. At this early stage in the preparation of a new Local Plan for Thurrock, it would be helpful to understand the current situation in more depth. This may be something to be undertaken prior to the Issues and Options (Stage 2) Consultation scheduled for October/November 2016. Preferably, Thurrock Council should clearly set out the current position in terms of the delivery of the Core Strategy's vision to transform the Lakeside Basin into a new regional centre, and the potential for this strategy to change in light of new evidence. Core Strategy Policy CSTP7 states that 50,000 sq. m of net comparison floorspace by 2019, at least 4,000 sq. m of net convenience floorspace, up to 3,000 new dwellings and other employment and commercial leisure floorspace will be delivered to realise this vision. It would be helpful to understand how much of this floorspace has already been delivered or is likely to be achieved via planning permissions that have been granted. This will enable an understanding of how the strategy towards Lakeside may change, what potential options may be, and the next steps in the development of Thurrock's Local Plan policies going forward. Duty to Cooperate Dartford continues to actively	Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace. As part of the process of preparing the new Local Plan the Council will need to review the current policy approach for Lakeside and to update the quantitative projections for future retail and convenience shopping needs set out in the adopted Core	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.



Comment ID	Consultee Details	Response to question 2 - Do you feel that all the key cross boundary issues have been identified?	Officer Response	Officer Action Points
		<p>engage with its neighbours on an ongoing basis in relation to strategic cross-boundary matters, including, in relation to Thurrock, cross-river links and major developments such as the proposals for London Paramount. Dartford's Duty to Cooperate Statement January 2016 in support of the Development Policies Plan Pre-Submission Draft acknowledges strategic retail issues as subject to the Duty. Thurrock has also previously identified the need for further cooperation in the context of Lakeside and Bluewater. Dartford welcomes this approach and is taking a lead role in establishing a strategic retail cooperation group, hopefully in close collaboration with Thurrock; and including engagement with the Greater London Authority. It is expected to feature discussion of the future of Lakeside and other strategic scale shopping provision. In order to help discharge the Duty, it would assist the group and Dartford to further understand the impact of changes to the retailing environment in the Thurrock context, to enable discussion on potential options for Thurrock's future Local Plan policies relating to the strategy for Lakeside. It is understood that these issues will likely be addressed via the South Essex Strategic Retail Study currently being undertaken. Dartford would welcome the opportunity to engage with this work and undertake further discussions regarding how the Study will take account of the relationship between Lakeside and other centres, including surrounding Town Centres and Bluewater, especially given the large geographical area being studied. It would also be beneficial to understand whether or not the study will recommend local policy approaches to this issue. Cooperation between Dartford, Thurrock and others should continue be enhanced in relation to strategic retail matters. Dartford has a Duty to Cooperate Protocol in place to facilitate engagement with neighbouring local planning authorities on strategic cross-boundary matters, which could be employed here. This would help to facilitate positive engagement leading to agreement between the parties involved. Dartford believes such engagement should be informed by relevant principles. For instance, there is a natural variation in terms of different approaches and the level of resources available in engaging on this issue, especially considering the likely geographic range of discussions covering three separate regions. No single approach will necessarily be definitive or correct and a clearer understanding of issues affecting both specific locations and the wider retailing environment will be beneficial to ongoing effective engagement and cooperation. The need to understand the commercial pressures and uncertainties facing the retail sector as a whole will also be paramount in ensuring</p>	<p>Strategy. The Council has also prepared the Lakeside Development Framework and the Lakeside Transport Strategy to help inform the preparation of an Inset Plan to manage the future development of the area. Both studies are available to view on the Councils Local Plan website. The Council will engage proactively with neighbouring local authorities through the Duty to Cooperate process to ensure the proper management and development of a competitive and viable network of centres across the Thames Gateway and East London.</p>	

Comment ID	Consultee Details	Response to question 2 - Do you feel that all the key cross boundary issues have been identified?	Officer Response	Officer Action Points
		effective cooperation and engagement. There is also a need to maintain a positive approach to allowing local solutions to emerge, especially given the unique scale of growth envisaged in the Thames Gateway area and Greater London.		
LPIO_101	DP World - London Gateway Via Trevor Hutchinson Planning and Transportation Ltd (Trevor Hutchinson)	Sense of Place - Sustainable Transport provision and accessibility - Freight Accessibility Assessment	Comments welcomed. The Council will work in partnership with the respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_200	EA Strategic Land Via Icen Projects Ltd (David Churchill)	Local planning authorities have a Duty to Co-operate on strategic planning issues that cross administrative boundaries. The purpose of the Duty to Co-operate is to ensure strategic priorities are properly co-ordinated and clearly reflected in Local Plans. Recent examinations of Local Plans have confirmed that Inspectors will require robust evidence to be provided to show how a local authority has complied with the Duty to Co-operate. Examples include: (a) Clear evidence is required to show how joint working groups have influenced the provisions within a finalised local plan (Examination of Kirklees Core Strategy (April 2013)); (b) The unmet development needs of nearby local planning authorities should be given satisfactory consideration and co-operation with local planning authorities should be embedded as an integral part of the plan making process (Examination of Mid Sussex District Plan (December 2013)); and (c) There should be sufficient and robust evidence demonstrating that every effort has been made to cooperate with nearby local planning authorities and that cooperation should produce effective and deliverable policies on cross boundary matters (Examination of Runnymede Borough Council (April 2014)). The national and international importance of the Borough has been recognised through both the intention of Highways England to progress a Lower Thames Crossing and the announcement within the Spring Budget 2016 of the Thames Estuary Growth 2010 Growth Commission, to be chaired by Lord Heseltine. The plan currently makes no note of the proposals, or the enhanced linkages it will provide between the M2 and M25. The benefits it would bring in unlocking development potential should be discussed and progressed between key stakeholders. In addition, EASL proposes that the	Comments noted. Until such time as the Government makes a decision on the Lower Thames Crossing it remains difficult for the Council to plan appropriately for the future development of Thurrock. The production of the Local Plan is being underpinned by the preparation of a wide range of need and capacity studies consistent with the policy approach and guidance set out in the National Planning Policy Framework and PPG. This includes the South Essex Strategic Housing Market Assessment, the Thurrock HLAA and the Thurrock Green Belt Assessment. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing Strategic Housing Market Assessment/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2)	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

Comment ID	Consultee Details	Response to question 2 - Do you feel that all the key cross boundary issues have been identified?	Officer Response	Officer Action Points
		<p>Council seek to commission an independent assessment of The role of the Green Belt as opposed to Maintaining the Green Belt (identified at Figure 2 in the consultation document). The National Planning Policy Framework provides local authorities an opportunity to review their Green Belt boundaries through the preparation of an updated Local Plan. Paragraph 83 maintains that at the point of reviewing a Local Plan, local authorities should consider the Green Belt boundaries having regard to their intended performance in the long term, so that they should be capable of enduring beyond the plan period. The Council should use this opportunity to strategically review its own boundaries to ensure the objective of National Planning Policy Framework paragraph 84; to promote sustainable patterns of development is met.</p>	<p>Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.</p>	
LPIO_317	<p>Ellandi LLP (Mark Robinson) Via Savills (Chris Moore)</p>	<p>Ellandi agree with the range of cross boundary issues identified and welcome the inclusion of retail needs as something that the Council should be working with key partners to address. This should include consideration of retail need across the Plan area, taking into account cross-boundary requirements. This will of course require a substantial update to the Thurrock Retail Study 2007 (refreshed 2012). The update report should not just seek to roll forward capacity figures to set the quantum of floorspace that development management policies will need to accommodate. The requirement for a significant increase in new housing and economic growth will necessarily form the backdrop to assessing both quantitative capacity but also the qualitative need for further retailing within Thurrock. The Plan must therefore provide a clear strategy as to where and when any further retail development will be accommodated to ensure that the town centres first approach of the National Planning Policy Framework (National Planning Policy Framework) is properly considered and is not undermined by plan led capacity being brought forward in advance of the corresponding population growth envisaged through substantial housing requirements. This should also take account of the potential implications that any expansion of the Lakeside Shopping Centre may have on defined town centres within Thurrock such as Grays. In summary, the objectively assessed need for retail / traditional B Class employment and residential growth should be considered as strategic issues within the Plan so that the plan led need is supported by a clear spatial strategy for phased growth over the lifetime of the Plan. This fosters investor confidence and also allows for triggers to be built into the strategy, such as partial review, should any parts of the strategy fail or not deliver as anticipated. This approach will secure the flexibility that the National Planning Policy</p>	<p>Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region including Thurrock over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace.</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>



Comment ID	Consultee Details	Response to question 2 - Do you feel that all the key cross boundary issues have been identified?	Officer Response	Officer Action Points
		Framework calls for over the lifetime of the plan, but ensures that the spatial strategy for growth is only altered through the plan making process where cross-boundary implications are appropriately considered, rather than through updates to evidence outside of the plan process.		
LPIO_280	Environment Agency (Lizzie Griffiths)	We support the council's recognition of cross-boundary working and the inclusion of managing flood risk as an issue. However, we consider that this could be widened to managing the water environment to include not just flood risk, but issues such as water quality and the Water Framework Directive (WFD), which are best considered on a catchment basis.	Comments welcomed. The Council will work in partnership with the respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_152	Essex Bridleways Association (Sue Dobson)	As per question 1 we would like to see the Green Grid Strategy and a strategy to link public rights of way network between the neighbouring boundaries of Thurrock district.	Comments noted. The Council has commissioned a number of technical studies designed to update the Green Grid Strategy. These include the development of an Active Travel Strategy which will address the issues raised by the respondent.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan.
LPIO_207	Essex County Council (Lesley Stenhouse)	ECC support the approach to identify cross boundary issues and the reference to neighbouring Local Plans, within paragraphs 13-14: ECC is keen to appreciate the synergies and potential impacts associated with the future spatial approach adopted by neighbouring authorities. As outlined in section 1 above, ECC is committed to working closely with local authorities who adjoin Essex to ensure housing and infrastructure requirements meet the needs of residents, drive economic prosperity, and seek to protect and enhance the local environment. Please refer to the plans, strategies and priorities listed in Section 1A above and in response to question The Economic Plan for Essex 2014; A127 Corridor for Growth an Economic Plan 2014 and Essex Transport Strategy, the Local Transport Plan for Essex (June 2011) are particularly, relevant with their lists of cross boundary projects, issues and opportunities, between ECC and the South Essex authorities which require co-investment, as set out response to question The following additional cross boundary issues have been identified for your consideration: Transportation and Highways: Future growth as anticipated within the new Local Plan will place significant pressure on highway and transport accessibility and connectivity across Thurrock's administrative area,	Comments welcomed. The Council will ensure that Essex County Council engaged in the development of the Local Plan evidence base. In doing so the Council would welcome further discussion with the County Council on the nature of the evidence base required and the opportunities for the joint - commissioning of technical work across Thurrock and South Essex.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate

Comment ID	Consultee Details	Response to question 2 - Do you feel that all the key cross boundary issues have been identified?	Officer Response	Officer Action Points
		<p>neighbouring districts, sub-regions and nationally with the proposals for the Lower Thames Crossing. ECC considers that new government funding streams and ambitious infrastructure plans to meet the growing Essex communities, will require a leadership grouping of County and District areas (and partners) which is better placed to co-ordinate and deliver the highways and transportation programmes. ECC supports closer working in South Essex, and would seek Thurrock Councils engagement with the new South Essex Transport Board alongside ECC and SBC. Strategic Transport Boards have now been established by ECC to oversee the forward planning of transport infrastructure for growth, and to reach a consensus in each area on the transport interventions necessary to manage existing pressures and support growth, which in future is likely to take the lead from the evidence, based growth within emerging Local Plans. These Boards will jointly agree the major transport improvements needed in their areas and bring together the following organisations and agencies: Lead Highway Authority: Essex County Council Planning Authorities: City, District and Borough Councils of Greater Essex Neighbouring Counties: Cambridgeshire, Hertfordshire, Suffolk, London Boroughs Essex Unitaries: Southend and Thurrock Agencies: Highways England, Network Rail, Homes and Communities Agency Rail Franchise operators Bus Operators: larger operators in Essex or representatives of the Coach and Bus Council Key ports and airports, London Stansted and London Southend Airports; Ports of London Gateway, Tilbury and Harwich. ECC envisaged that the primary role of the Transportation Boards will be to determine infrastructure priorities, encourage partnership working on transport and growth issues, and fulfil the duty to co-operate on transport planning and delivery in the context of Local and National Plans. The significant growth planned along the A127/A13 growth corridors throughout south Essex in emerging Local Plans (such as this Draft Local Plan) are reliant on new and improved strategic infrastructure of regional and national importance (including the Lower Thames Crossing) to deliver this growth, as well as securing the protection of the A127 corridor for improvement. Highways Modelling: ECC, as a neighbouring highway authority, will need to be satisfied with the approach to highway modelling given the strategic location of Thurrock Council to the county of Essex. The new Thurrock Local Plan should take into account any likely impact on key transport corridors on the A12 Corridor and A127/A13 Corridor and the key strategic junctions and transport corridors, which need to be considered in any modelling, namely M25</p>		

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		<p>junctions 28, 29 and 30/3 Despite recent improvements there are still a number of locations on the local strategic road network where journeys are unreliable or improvements will be required to support significant numbers of new homes. ECC will continue to identify measures to tackle the causes of unreliable journeys and work with local planning authorities to identify investment needs to support growth. The highways modelling should also have regard to a number of other national, sub regional and local highway infrastructure projects and investment commitments surrounding the borough including: A12 M25 to Chelmsford (D17) raising section from M25 to Chelmsford to 3 lanes to help address congestion problems and inconsistent standards in the next road period (next 5 years) Strategic M25 Junction 28 &amp; 29 improvements. Especially J28 (E12) upgrading the interchange with the A12 to provide dedicated left turn slip lanes and improvement of gyratory system Late Road Period (2021). potential impact of the approved Lower Thames Crossing route especially Option C; the A127 which is already operating at overcapacity and the identified cumulative housing growth along the A127, as outlined in the A127 Corridor for Growth an Economic Plan2014; A127/A130 Fairglen Interchange emerging improvement proposals A13 improvements; and Impact on the neighbouring local road network. As part of any highway modelling it will be necessary to involve Highways England given the proximity to the A13, A12 and M25, to ensure their support for any underlying parameters to modelling, and their views of the impact of strategic sites on their network. ECC as highway authority will continue to work with Thurrock Council and recognise the need for joint working in the form of South Essex strategic highway modelling. Further to the above, ECC support the opportunity to work with the two unitary authorities of Thurrock Council and Southend on Sea BC, to undertake wider South Essex Strategic Network Modelling, as well as the development of a joint A13 corridor for growth strategy, similar to the A127 Corridor for Growth an Economic Plan, referred to above. Please also refer to the comments within the transport section under the Accessibility heading and in response to questions 25-28 which equally apply. Education Provision: The cross border movement of school pupils has not been identified as a key cross boundary issue. Currently the numbers of pupils moving between ECC and Thurrock Councils administrative areas to attend school are relatively small. There is no reason to anticipate that this situation will change if, as is envisaged, the majority of new housing is located in areas that are some distance</p>		

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		<p>from the border between the two authorities i.e. Thurrock Urban Area (Purfleet, Lakeside, Grays, Tilbury, Chadwell St Mary). However, reference is made in the Core Strategy to some 2,100 dwellings being allocated in the outlying settlements to the north of the A1 Equally it is noted that the adjoining Boroughs of Basildon and Brentwood identify significant new developments within close proximity to their boundaries which could affect the movement of pupils. ECC consider this to be a key cross boundary issue and would want to be involved in discussions via Duty to Co-operate meetings, concerning the provision of sufficient primary and secondary school places to serve these new developments. Minerals and Waste: ECC as a neighbouring Minerals and Waste Planning Authority, consider the planning, management and movement of minerals and waste related developments to be a cross boundary issue. ECC has an adopted Minerals Local Plan (July 2014) and is currently preparing a replacement joint Waste Local Plan with Southend on Sea BC and both are considered relevant. ECC and Thurrock Council are members of the East of England Regional Aggregates Working Party and the East of England Waste Technical Advisory Board, which undertake technical evidence and provide a high level duty to co-operate Forum. Please also refer to detailed comments within the Minerals and Waste Section below. Lead Local Flood Authority: ECC as a neighbouring Lead Local Flood Authority consider the need to maintain a joined up approach to flood risk management and strategy as a strategic cross boundary issues. ECC will continue to work with Thurrock Council to explore cross boundary issues and opportunities to alleviate existing flooding. Risks from Climate Change: ECC recommend that Climate Change is recognised as a cross boundary issue. This is based upon the references to it within the SA scoping report, which states that adaptation to climate change will be addressed within each topic where there are clear links, as relevant and applicable to the proposals and remit of the Local Plan. Employment Needs: ECC considers the positioning of Thurrock within the sub region of south Essex should be fully explored. For example, more could be made of the links and dependencies that exist with neighbouring authorities, especially in relation to transport capacity to support growth of areas to the east of the Borough. There is also a wider issue of connecting key employment sites to residential areas. A number of areas do suffer from poor accessibility, which may need to be more appropriately addressed at a sub-regional rather than council level. This could be explored through the South Essex Strategic Planning Duty to Co-operate</p>		

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		Groupings as well as the South Essex Growth partnership, to support the development of Thurrock's plan. Please also refer to the Economic Plan for Essex (2014) for wider economic growth context within Greater Essex.		
LPIO_289	Gladman developments Ltd (Phil Bamford)	The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2012 Coventry Core Strategy Examination and the 2013 Mid Sussex Core Strategy Examination, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan. Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration, as set out in the PPG it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard Thurrock must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation.	Comments noted. The production of the Local Plan is being underpinned by the preparation of a wide range of need and capacity studies consistent with the policy approach and guidance set out in the National Planning Policy Framework and PPG. This includes the South Essex Strategic Housing Market Assessment, the Thurrock HLAA and the Thurrock Green Belt Assessment. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing Strategic Housing Market Assessment/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs. At this stage in the plan-making process no evidence has been submitted to the Council which supports the need for Thurrock to allocate land to meet the future development needs of any adjoining area. Should this be the case in future the Council work with neighbouring authorities to resolve this issue through the Duty to Cooperate process.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

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LPIO_251	Gravesham Borough Council (Wendy Lane)	Gravesham BC feels that the key cross boundary issues have been identified NB. Gravesham is in Lakesides catchment for shopping, leisure etc. and regards this as a strategic cross boundary issue between the two authorities. Gravesham BC is not in the same HMA as Thurrock but we are both in the London Travel to work area (TTWA) as defined by ONS and published in July 2015, using data from the 2011 Census.	Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace. As part of the process of preparing the new Local Plan the Council will need to review the current policy approach for Lakeside and to update the quantitative projections for future retail and convenience shopping needs set out in the adopted Core Strategy. The Council has also prepared the Lakeside Development Framework and the Lakeside Transport Strategy to help inform the preparation of an Inset Plan to manage the future development of the area. Both studies are available to view on the Councils Local Plan website. The Council will engage proactively with neighbouring local authorities through the Duty to Cooperate process to ensure the proper management and development of a competitive and viable network of centres across the Thames Gateway and East London.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_420	Greater London Authority (Jorn)	Thurrock is located within the Thames Gateway Coordination Corridor extending from east London into Kent and Essex. These corridors are recognised in Policy	Comments welcomed. The Council will work in partnership with the respondent and other	The Council will arrange a meeting with the respondent to discuss their



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	Peters)	3 of the London Plan for the co-ordination of planning and investment. We are pleased to work closely with the Council on the Thames Gateway Strategic Group promoting the benefits of development and investment across the Gateway.	stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_404	Historic England (Michael Stubbs)	Figure 2 relates to the duty to co-operate within the evidence base. The identification of protecting nature and heritage assets is welcome. With reference to the positive strategy for the conservation of the historic environment as set out in the National Planning Policy Framework, Historic England recommends the inclusion of protecting and enhancing within these strategic priorities. Paragraph 17 should be amended to delete English Heritage and insert Historic England.	Comments welcomed. The Council will work in partnership with the respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_233	Home Builders Federation Ltd (James Stevens)	Duty to cooperate (page 8 of the draft plan) We have noted the discussion in the draft plan on page 8 about the need to coordinate the Thurrock local plan with those being produced by Thurrock's neighbouring authorities and with London. The HBF will be very interested to see how this develops. Cooperation when planning for housing will be especially important as paragraph 13 observes. We note in paragraph 13 that Thurrock forms part of the South Essex Housing Market Area. We would expect to see reasonably consistent assumptions being made by the HMA authorities on the matter of the treatment of migration (internal and international) and matters such as Unattributable Population Change. We note the reference in paragraph 13 to the influence of London. We would expect Thurrock Council and its HMA partners to demonstrate how they intend to address the London problem through their collective plans. This problem has two components: first a) it will be necessary for the HMA to show how it intends to respond collectively to the migration assumptions that under-pin the Mayor of London's new London Plan. This includes adjusting the demographic scenarios in the HMA to account for increased population in the HMA over the plan period as a consequence of higher levels of net inward migration and decreased in-migration to London. Secondly, b) it will be necessary for the HMA authorities to demonstrate whether it will be necessary to increase the supply of homes in the HMA area to compensate for London's unmet need, which is at least 7,000 dwellings a year and is probably going to be much higher than this as many London boroughs are	Comments noted. The production of the Local Plan is being underpinned by the preparation of a wide range of need and capacity studies consistent with the policy approach and guidance set out in the National Planning Policy Framework and PPG. This includes the South Essex Strategic Housing Market Assessment, the Thurrock HLAA and the Thurrock Green Belt Assessment. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing Strategic Housing Market Assessment/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

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		beginning to argue that they are unable to accommodate the London Plan benchmarks. We will also scrutinise how far Thurrock has engaged with those London boroughs with whom it is a neighbour and where there is an established migratory or commuting relationship. Havering is the obvious case, but there are probably well established migration and commuting patterns with other London boroughs (e.g. Barking & Dagenham and Redbridge). The Mayor of London has made it clear in his new London Plan (2015) that the London boroughs, especially the outer London boroughs who share a border with local planning authorities in the greater south east, are expected to cooperate with those authorities to ensure that there is a common approach to issues of cross border significance. One such issue would be the importance of taking a consistent approach to the treatment of demographics, ensuring that the Mayor of London's migration assumptions are reflected in the HMAs housing assessment. Given the housing pressures in London, it is probably more likely than unlikely, that Thurrock will experience an increase in population over the plan period as more people leave London in search of places where the affordability of housing is better. The HBF has been led to understand that the GLA is beginning to engage with the local authorities in the wider south east, providing them with demographic scenarios that reflect the Mayor of London's migration assumptions (his Central Variant see paragraph 10C of the London Plan). It would be useful if the Council described whether this has been the case.	of appropriate spatial options for meeting the Boroughs future development needs. At this stage in the plan-making process no evidence has been submitted to the Council which supports the need for Thurrock to allocate land to meet the future development needs of any adjoining area. Should this be the case in future the Council work with neighbouring authorities to resolve this issue through the Duty to Cooperate process.	
LPIO_33	Industrial Chemicals Ltd Via Lawson Planning Partnership Ltd (Aarti O'Leary)	The Boroughs waste management needs, taking account of the need to plan for a proportion of London's waste management needs, ought to be addressed.	The Council will work in partnership with the respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_73	Intu Lakeside Ltd (Marc Myers) Via Nathaniel Lichfield & Partners (Stephanie Walker)	It is understood that the Retail Study produced by Tym & Partners in 2007, and updated in 2012 to project forecasts to 2026, will be updated again as part of the Local Plan process. It is also understood that work on the South Essex retail study is progressing. This will form an appropriate evidence base and one which will enable consideration of cross boundary matters relating to retail and town centre issues. Intu requests they are given the opportunity to comment on these studies in due course so	Comments welcomed. The Council will ensure that the respondent and other stakeholders are fully engaged in the development of the Local Plan evidence base.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of

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		that the studies can benefit from intu's knowledge of the market generally and be cognisant of existing and future development plans which will help demonstrate how the districts needs can be provided for. Intu has submitted information in response to the call for sites to assist with this process.		individual sites for development.
LPIO_180	Local Access Forum (Sue Dobson)	Cross boundary issues are relevant where public rights of way are concerned and we would like to see a strategy to link and enhance them with neighbouring boroughs. Our comment to question 1 is pertinent in that the Green Grid Strategy is a cross-boundary strategy and this should be part of the Local Plan consideration.	Comments noted. The Council has commissioned a number of technical studies designed to update the Green Grid Strategy. These include the development of an Active Travel Strategy which will address the issues raised by the respondent.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan.
LPIO_350	Medway Council (Catherine Smith)	Medway Councils notes the list of Cross Boundary Issues that are listed in figure 2 of the Issues and Options (Stage 1) document. However, it is felt that minerals and waste should be a separate topic. It is felt that this should be in line with paragraph 156 of the National Planning Policy Framework that outlines strategic issues considered under the duty.	Comments welcomed. The Council will work in partnership with the respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_329	Miller Strategic Land Via MRPP (Richard Robeson)	Transport issues should be included given the number of national and strategic routes passing through the Borough and the implications arising from an additional Thames Crossing. The Council also fails to emphasise the importance of working closely with the GLA and peripheral London Boroughs in the context of the development pressures facing the Capital and recognising that housing and other markets are not neatly confined to South Essex authorities.	Comments noted. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Essex County Council, Highways England, Network Rail, Transport for London and other transport service and infrastructure providers. This work will need to consider the impact of development on both the national and local transport networks serving the Borough.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate
LPIO_382	Natural England (Jamie Melvin)	Natural England has identified a number of cross boundary issues which can be encapsulated under the heading Protecting Nature and Heritage Assets. Note that	Comments welcomed. The Council will work in partnership with the respondent and other	The Council will arrange a meeting with the respondent to discuss their

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		<p>Natural England would expect the Local Plan to seek to enhance as well as protect the environment. Potential enhancements may include the England Coast Path which is likely to be a cross boundary issue. Many of the environmental designations which the plan will need to consider fall partially or wholly within other local planning authority areas. The plan should also take account of likely impacts from any proposed housing on sites beyond the authority's boundaries, such as Basildon Meadows Site of Special Scientific Interest, and any proposed housing outside Thurrock that may have in combination effects with the Local Plans allocations. Cross boundary issues and in combination effects will be particularly important when considering potential impacts on European sites through the Habitats Regulations Assessment (HRA) process.</p>	<p>stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.</p>	<p>representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.</p>
LPIO_133	Persimmon Homes Essex (Anna Davies)	<p>Paragraph 178 of the National Planning Policy Framework promotes a duty to cooperate between LPAs. This involves LPAs working collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans. Joint working should enable LPAs to work together to meet development requirements which cannot wholly be met within their own areas for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework. The Greater London Authority (GLA) is unable to meet their housing needs. Consequently, it is likely that the LPAs surrounding the Greater London Authority (GLA) will be required to make up this shortfall. The GLAs OANs amount to 49,000 dwellings over 20 years, and up to 62,000 in the initial years of the plan in order to address the historical shortfall. The Further Alterations London Plan (FALP) only targets to deliver 42,389 dwellings of the plan period (2011 - 2031). Thurrock need to factor in the extent to which it will need to assist in meeting housing needs within the capital. Thurrock's housing market is influenced by its proximity to London and its attraction as an affordable location for those wishing to commute to London.</p>	<p>Comments noted. The production of the Local Plan is being underpinned by the preparation of a wide range of need and capacity studies consistent with the policy approach and guidance set out in the National Planning Policy Framework and PPG. This includes the South Essex Strategic Housing Market Assessment, the Thurrock HLAA and the Thurrock Green Belt Assessment. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing Strategic Housing Market Assessment/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs. At this stage in the plan-making</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>

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			process no evidence has been submitted to the Council which supports the need for Thurrock to allocate land to meet the future development needs of any adjoining area. Should this be the case in future the Council work with neighbouring authorities to resolve this issue through the Duty to Cooperate process.	
LPIO_163	Port of Tilbury (Perry Gladding) Via Vincent and Gorbing (Hannah Philips)	Other key cross-boundary issues that need to be considered are (i) energy and waste, for the reasons set out above; and (ii) air quality. Air quality is a clear cross-boundary issue and it is vital to ensure that declining air quality does not impede further regeneration and growth and is therefore positively addressed.	Comments welcomed. The Council will work in partnership with the respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_370	Recycled in Orsett Via Icen Projects Ltd (Andrew Gale)	It is understood that it is Highways England's intention to progress a Lower Thames Crossing. The draft consultation document makes no reference to this significant piece of infrastructure. Therefore, in response to Question 2, this is a key cross boundary issues that does not appear to have been considered within the current consultation document.	Comments noted. Until such time as the Government makes a decision on the Lower Thames Crossing it remains difficult for the Council to plan appropriately for the future development of Thurrock.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_83	Rochford District Council (Natalie Hayward)	Rochford District Council welcomes identification of key cross boundary issues in Figure 2. The Council however would like to suggest that minerals and waste are included within this figure given that there are three local authorities responsible for minerals and waste planning in Essex.	Comments welcomed. The Council will work in partnership with the respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_189	South Essex College Via Carter Jonas (Jennifer Islip)	The College agrees with most of the key cross boundary issues that have been identified in Figure In particular, the College suggests that meeting Housing Need should be discussed and analysed in detail with neighbouring Local Planning Authorities given that like Thurrock, many	Noted. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the



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		adjoining authorities are also heavily constrained by the Green Belt and therefore meeting housing need could be particularly challenging without some/all of the authorities undertaking a Green Belt Review. The College suggests a more positive approach should be taken to the cross boundary issue of the Green Belt and instead of the objective being Maintaining the Green Belt consideration should be given to identifying suitable development opportunities in the Green Belt that could assist with meeting housing need. Not all Green Belt land performs the same level of Green Belt function as set out at Paragraph 80 of the National Planning Policy Framework. Land that does not assist with performing a Green Belt function should be considered for development as part of a Green Belt Review as suggested in answer to Question	decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing Strategic Housing Market Assessment/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_421	South Ockendon Centre (Wendy Curtis)	No. What plans have been made to ensure that the young people of Thurrock particularly (South Ockendon) have good facilities to pursue sports etc. Not just scouts and Guide groups.	Comments noted. The Council is preparing a new Active Place Strategy which will identify proposals to improve the nature, quality and provision of leisure and recreational facilities across the whole of Thurrock. The Strategy which is being prepared jointly with Sport England will also identify priorities for funding and will help inform the preparation of the Local Plan including policies to protect open space, including football pitches, from development and to obtain additional funding from developers to maintain and enhance both new and existing leisure opportunities.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_361	Strutt and Parker LLP (Richard Clews)	Paragraph 47 of the National Planning Policy Framework states that, in order to boost significantly the supply of housing, local planning authorities should use their evidence base to ensure their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area. The National Planning Policy Framework further states (paragraph 146) that in order for a Local Plan to be sound it must be prepared based on a strategy which seeks to meet	Comments noted. The production of the Local Plan is being underpinned by the preparation of a wide range of need and capacity studies consistent with the policy approach and guidance set out in the National Planning Policy Framework and PPG. This	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of



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		<p>objectively assessed development requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. As such, in addition to the housing needs of the District itself, the objectively assessed housing needs of the wider housing market area will have to be considered as the New Local Plan is progressed in order for the Plan to meet the requirements of the National Planning Policy Framework. Furthermore, whether any of the Districts neighbours have unmet housing need and whether the District has the capacity to accommodate this, must be considered in future iterations of the New Local Plan. The Council will therefore need to consider the cross boundary issues and how the housing and employment needs of the housing market area will be delivered. It is considered that the Council have identified the main cross-boundary issues relating to the Borough. However, in exercising its duty, the Council should ensure that it considers the impact of growth, employment and migration from London when working on these issues.</p>	<p>includes the South Essex Strategic Housing Market Assessment, the Thurrock HLAA and the Thurrock Green Belt Assessment. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing Strategic Housing Market Assessment/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs. At this stage in the plan-making process no evidence has been submitted to the Council which supports the need for Thurrock to allocate land to meet the future development needs of any adjoining area. Should this be the case in future the Council work with neighbouring authorities to resolve this issue through the Duty to Cooperate process.</p>	<p>individual sites for development.</p>
LPIO_450	Vivian Humphry	<p>Basildon Council has voiced its objection to plans to build on Greenbelt to N.E. of Corringham. Have their comments been noted?</p>	<p>Comments noted. Relevant comments received from consultees on the now suspended Site Specific Allocations and Policies Local Plan will be reviewed in the context of the emerging Local Plan.</p>	<p>No action required.</p>

### Responses to Question 3

Comment ID	Consultee Details	Response to question 3 - What would you like Thurrock to be like in the future and what do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?	Officer Response	Officer Action Points
LPIO_469	Anthony Newell	New hospital with A&E Dept. for Thurrock: More GP surgeries; More schools Better care in the community for sick, disabled elderly and disadvantages members of the community. More social housing. More affordable housing. Protect our homes. Ensure adequate staffing for social services, police fire ambulance services Improve condition of roads and traffic in Thurrock.	Comments noted. The Council will undertake a full Health Impact Assessment as a key element of the Integrated Assessment (SA/SEA/HIA/EqIA) being prepared in support of the Local Plan. The Council will also work in close partnership with service providers to ensure that future health and growth needs are aligned and met by the provision of improved service and facilities where it is necessary and appropriate to do.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_264	Arena Leisure Enterprises Ltd (Lesley Wootten) Via GL Hearn (David Maxwell)	The Thurrock Local Plan should continue to reflect the established policies and strategies within the adopted Core Strategy related to growth of Lakeside Regional Centre. Core Strategy policy SS02 identifies Lakeside as a priority area to increase prosperity and growth in Thurrock, and to promote and diversify the role of Lakeside as a regional centre for employment, housing, retail and leisure. It is submitted that these policy objectives should remain and be strengthened through the emerging Local Plan. Specifically, the emerging Local Plan must identify and make clear the land at and adjacent to Lakeside Regional Centre that can delivery housing to achieve the established target of at least 3,000 dwellings at the Regional Centre. Land at Arena Essex will need to be released from the Green Belt through the emerging Local Plan to ensure that the economic, housing, environmental, social, community and health outcomes are achieved for Lakeside Regional Centre.	Comments noted The South Essex Housing Market Assessment (SHMA) will provide evidence of the need for new housing in the Borough and the types of housing required to meet the Thurrock's Objectively Assessed Housing Need (OAN) in full. The Thurrock Housing Land Availability Assessment (HLAA) will consider the planning merits of the respondents site and the outcome of this process will inform any future decisions on whether to allocate the site(s) in the Local Plan for development.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_495	Daphne Revell	A safe working /housing environment with long-term job prospects and as little impact on the current agricultural/ Green Belt sites which make Thurrock (at present) such a rewarding environment in which to live. Also include lots of leisure facilities (sadly lacking with all the housing developments going on at present) and also to provide sufficient schools to cope with the extra population.	Support noted The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin

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			their representations,	the preparation of a sound plan and the allocation of individual sites for development.
LPIO_194	EA Strategic Land Via Icen Projects Ltd (David Churchill)	This section of the consultation document identifies Thurrock's unique location, which benefits from large areas of green open space and riverfront whilst being in close proximity to the nation's capital. Despite its strategic location we have noted the Councils consideration at paragraph 6 that some of the aims and ambitions of the current Core Strategy have wavered as a result of the economic crisis. EASL believes the key to realising the Councils vision is centred on the national objective of achieving sustainable development and ensuring that proposals put forward by developers are deliverable and would contribute towards realising the Councils goals within the plan period.	Comments noted. The Council recognises the importance of achieving the sustainable development of the Borough and ensuring that the sites allocated in the Local Plan are deliverable. The Local Plan CIL and Viability Study will inform the plan-making process and advise on the matters raised by the respondent.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_281	Environment Agency (Lizzie Griffiths)	Creating the conditions for economic growth and creating new jobs should be a top priority for the Plan, and protection and enhancement of the environment plays an important role in that. We are pleased that this recognised in paragraph 1 of the Plan. The water environment supports economic growth by supporting households, industries, agriculture, recreation and tourism. A high quality water environment also makes places attractive to live in, providing a valuable local amenity with related physical and mental health benefits. All development needs to be sustainable from an environmental perspective. New development must be resilient to flood risk and the challenges brought by climate change. The Plan must ensure an integrated approach to managing flood risk and securing additional environmental gains through that approach, such as improving water quality and biodiversity through mitigation using open space and Sustainable Drainage Systems. Opportunities should be sought to improve river corridors and wetlands in this way. The WFD aims to raise the environmental standards of our rivers, lakes, estuaries, coasts and groundwater aquifers, such that they benefit people and wildlife to the greatest extent possible and is key tool for ensuring that rivers and aquatic habitats are enhanced or deterioration prevented. Where development or activity has been established as having the potential to be in breach of the Directive, applicants must show that the planned activity will not be in contravention of the legislation, i.e. that it will	Comments welcomed. The Council will work in partnership with the respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.

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		not cause deterioration of any waterbody or prevent the achievement of good ecological status/potential.		
LPIO_153	Essex Bridleways Association (Sue Dobson)	An enhanced public rights of way network ideally accessible to all users - walkers, cyclists, equestrians and the disabled - which will benefit environmental, recreational and health outcomes of the Local Plan.	Comments noted The Council has commissioned a number of technical studies designed to update the Green Grid Strategy. These include the development of an Active Travel Strategy which will address the issues raised by the respondent.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan.
LPIO_208	Essex County Council (Lesley Stenhouse)	The following may wish to be considered as Thurrock prepares its Local Plan vision: The need to provide excellent connectivity between residential, employment, retail and other uses that are not wholly reliant on the car. Particular consideration should be given to reducing severance caused by infrastructure to any proposed development sites and improving environmental quality. Sites for development should be underpinned by deliverable planning policies and incorporate infrastructure requirements. Specific reference to ascertainable development to recognise its importance, in line with the NPPF which states that economic, social and environmental elements should be sought jointly and this includes strategies to safeguard the environment, mitigating and adapting to climate change and securing good design. (NPPF Paras 6-10 and 18-22) The importance of the ecology and diverse habitat within the area should be recognised, having regard to its potential contribution in redeveloping brownfield sites, green infrastructure such as Sustainable Drainage Schemes (SUDs) and the River Thames. This is expanded further within the ecological comments in response to Question 33 (nature conservation) which equally apply to this question and question 9 (brownfield sites).	Support noted The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations,	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_237	Fitzpatrick Projects Ltd Via GL Hearn (David Maxwell)	The NPPF makes clear that Local Authorities should provide clear economic growth plans, including planning positively and proactively for growth and town centres. Policy SS02 of the adopted Core Strategy (2011) identifies Lakeside as a regional centre for employment, housing, retail and leisure. It is submitted that the emerging Local Plan should continue to focus on the established policy for growth of Lakeside Regional Centre. The emerging Local Plan should ensure that sufficient and adequate land is made available and allocated for a full	Comments noted. The South Essex Housing Market Assessment (SHMA) will provide evidence of the need for new housing in the Borough and the types of housing required to meet the Thurrock's Objectively Assessed Housing Need (OAN) in full. The Thurrock Housing Land	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.

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		range and mix of land uses at, adjoining and within walking distance of the Lakeside Regional Centre. Land at Ship Lane, and at Brickbarn Woods, as identified through the separate 2016 Thurrock Call for Sites and brownfield land register, should be allocated for residential, community, recreation, leisure and mixed uses accordingly.	Availability Assessment (HLAA) will consider the planning merits of the respondents site and the outcome of this process will inform any future decisions on whether to allocate the site(s) in the Local Plan for development.	
LPIO_292	Gladman Developments Ltd (Phil Bamford)	Q It is essential that Thurrock meets the full, Objectively Assessed Housing Needs within the borough, including any proportion of London's unmet needs, to ensure that all sections of the community have access to a home and the Council deliver the Government's intention to increase home ownership substantially. It is also essential that Thurrock plan on the basis of meeting economic growth, particularly focusing on the potential of the borough to generate new jobs (analysing past trends in the delivery of new jobs) and ensuring that housing is not a barrier to supporting that job growth aspiration.	Support noted. The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_252	Gravesham	In line with national guidance, Gravesham BC would like	Comments noted. The	The Council will arrange a

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	Borough Council (Wendy Lane)	Thurrock's Local Plan to be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring local planning authorities where it is reasonable to do so and consistent with achieving sustainable development.	production of the Local Plan is being underpinned by the preparation of a wide range of need and capacity studies consistent with the policy approach and guidance set out in the NPPF and PPG. This includes the SE SHMA, the Thurrock HLAA and the Thurrock Green Belt Assessment. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs. At this stage in the plan-making process no evidence has been submitted to the Council which supports the need for Thurrock to allocate land to meet the future development needs of any adjoining area. Should this be the case in future the Council work with neighbouring authorities to resolve this issue through the Duty to Cooperate process.	meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_405	Historic England (Michael Stubbs)	The section on the Local Plan vision itself reflects the Councils previous goals in the Core Strategy. Historic England agree that the Lower Thames Crossing has considerable potential to affect this vision and suggest	Comments welcomed. The Council will work in partnership with the respondent and other stakeholders to ensure that the	The Council will arrange a meeting with the respondent to discuss their representations and to agree



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		<p>that in this issues and options consultation careful regard is given to the potential implications for the historic environment. The historic environment is an important part of the Councils employment and retail sectors, contributing to attractive places that people want to visit, work and shop. The Local Plan should ensure that new employment related site allocations are sustainably located and avoid harm to heritage assets. The historic environment delivers social and community objectives through its contribution to place-making. These points are already contained in the Core Strategy at paragraph 5.147 that heritage assets are not only important in their own right but have a valuable role in helping to create a sense of place and links to the historic development of the distinct areas within Thurrock. Heritage assets often have an important cultural and economic role, as they can attract visitors and can act as catalysts for development and regeneration. Historic England recommends that the Councils vision continues to give emphasis to the relationship between place-making and the conservation and enhancement of significant places (designated and non-designated heritage assets). The future Local Plan should reflect this, embracing a positive vision involving the historic environment. It should embrace some of these existing objectives set out in the adopted Core Strategy and promote the positive role that heritage can contribute to the delivery of the plans vision.</p>	<p>local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.</p>	<p>next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.</p>
LPIO_35	<p>Industrial Chemicals Ltd Via Lawson Planning Partnership Ltd (Aarti O'Leary)</p>	<p>Park, Hillside and Pier Lodge are suitable for employment and housing purposes their allocation in the Local Plan would help to facilitate a major boost in the supply of jobs and homes required by Thurrock over the next 5 15 years. Please see LPPs accompanying Statement for further detail.</p>	<p>Comments noted. The South Essex Housing Market Assessment (SHMA) will provide evidence of the need for new housing in the Borough and the types of housing required to meet the Thurrock's Objectively Assessed Housing Need (OAN) in full. The Thurrock Housing Land Availability Assessment (HLAA) will consider the planning merits of the respondents site and the outcome of this process will inform any future decisions on whether to allocate the site(s) in the Local Plan for development.</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.</p>

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LPIO_74	Intu Lakeside Ltd (Marc Myers) Via Nathaniel Lichfield & Partners (Stephanie Walker)	<p>The Lakeside Basin was identified within the Core Strategy 2011 as one of the five main growth areas to help create 23,000 new houses and 26,000 new jobs within the borough. Intu supports the aspiration for a prosperous economy within Thurrock and Intu Lakeside will play a significant role in delivering this aspiration in the future. The Core Strategy 2011 supports the transformation of the northern part of the Lakeside Basin over the plan period by identifying and coordinating development requirements, and complementing development with the provision of infrastructure. It is recognised that a strong economy helps to create jobs and prosperity. Significant investment into the Lakeside Basin from Intu, in the form of infrastructure provision and on-going development at Intu Lakeside, has created a strong basis for Thurrock Council to realise its vision and aspirations for the Lakeside Basin. The further development of the Lakeside Basin as an Economic Hub will unlock development and attract further investment to the borough. The emerging Local Plan should build upon and extend the Core Strategy to support further development within the Lakeside Basin in order for it to continue to fully realise its potential as a regional centre for Thurrock and the wider economic region. We comment further on how that might be achieved in response to retail and leisure questions below. Intu Lakeside is in a strong position to continue its growth into the next plan period and Intu would like to continue to support Thurrock in realising its aspirations to create a thriving economic hub within the Lakeside Basin, supporting jobs, housing and local communities (see also the response to Question 25).</p>	<p>Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace. As part of the process of preparing the new Local Plan the Council will need to review the current policy approach for Lakeside and to update the quantitative projections for future retail and convenience shopping needs set out in the adopted Core Strategy. The Council has also prepared the Lakeside Development Framework and the Lakeside Transport Strategy to help inform the preparation of an Inset Plan to manage the future development of the area. Both studies are available to view on the Council's Local Plan website. The Council will engage proactively with neighbouring local authorities through the Duty to Cooperate process to ensure the proper management and development of a competitive and viable network of centres across the Thames Gateway and East</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Council's obligations under the Duty to Cooperate.</p>

<b>Comment ID</b>	<b>Consultee Details</b>	<b>Response to question 3 - What would you like Thurrock to be like in the future and what do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?</b>	<b>Officer Response</b>	<b>Officer Action Points</b>
			London.	
LPIO_13	Lawson Planning Partnership (Jenny Moor)	A key focus of the Local Plan will be to ensure it secures the delivery of the Boroughs objectively assessed need for housing in line with the requirements of the Framework. In doing so the Plan should seek to address the historic shortfall in housing delivery and ensure the Council can demonstrate the required number of specific and deliverable housing sites across the Plan Period. The allocation of our clients site at Orsett, which is deliverable within the first five-year period, would make a valuable contribution to assist in addressing the shortfall in housing and meeting housing needs.	Comments noted. The South Essex Housing Market Assessment (SHMA) will provide evidence of the need for new housing in the Borough and the types of housing required to meet the Thurrock's Objectively Assessed Housing Need (OAN) in full. The Thurrock Housing Land Availability Assessment (HLAA) will consider the planning merits of the respondents site and the outcome of this process will inform any future decisions on whether to allocate the site(s) in the Local Plan for development.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_181	Local Access Forum (Sue Dobson)	The vision for Thurrock should incorporate a drive to create a public rights of way network which is accessible to all users including walkers, cyclists, equestrians and the disabled which will benefit the environmental, recreational and health outcomes of the Local Plan.	Comments noted. The Council has commissioned a number of technical studies designed to update the Green Grid Strategy. These include the development of an Active Travel Strategy which will address the issues raised by the respondent	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan.
LPIO_330	Miller Strategic Land Via MRPP (Richard Robeson)	An excessively broad question which is likely to generate vague responses. Put simply, the key outcome must be to ensure that the Borough's development needs are met in full and facilitated through positively couched, realistic and deliverable policies and allocations. It is disappointing that the I&O document does not confirm what those needs are.	Support noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations,	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_134	Persimmon Homes Essex (Anna Davies)	Thurrock's geographical location offers a number of advantages for the Borough. The proximity and connections to London and the wider SE England play a significant role. There are also strong indigenous drivers, such as; the new port at London Gateway, further expansion of the Ports at Tilbury and Purfleet, planned	Support noted. The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust

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		expansion of Lakeside Shopping Centre, growing cultural hub at Purfleet, strong logistics and industrial hubs in West Thurrock, planned re-development of the former Coryton Oil Refinery. Significant investment is planned in new infrastructure, including A13 widening; Lower Thames Crossing, improvements to the M25 J30/J3 Thurrock has and can continue to create new economic opportunities to the wider area. The Council must ensure that they progress a Local Plan which supports this growth. Persimmon Homes believe that delivering housing is a key factor in doing so. Housing is vital in ensuring that the right amount and type of housing is provided to support the economic market. This will then lead to the delivery and improvement of new social infrastructure.	housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_118	Port of London Authority (Helena Payne)	It is pleasing to see that the Boroughs position by the River Thames has been recognised throughout the consultation documents. The areas riverside location is key to its future development and success and should be utilised as an asset where practicable. Particular reference has been made to five main growth areas, including Purfleet, Tilbury and the London Gateway, and whilst many of the key areas for regeneration are subject to the outcome of the Lower Thames Crossing, it should be borne in mind that these areas are key to the economic success of the Thames and rely heavily on the Thames for their success. In response to Question 3 and 4 of the Issues and Options (Stage 1) document, the PLA would hope to see the River Thames used as a key economic support in the development of these areas. In addition, I	Comments noted. The Council recognises the importance of the River Thames in contributing to the future economic growth and development of Thurrock. The issues raised by the respondent will be considered by the South Essex Economic Development Needs Assessment (SE EDNA) and the Thurrock Employment Land Availability Assessment (ELAA)	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.

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		would like to take this opportunity to highlight the PLAs support in the retention of riverside industry and employment locations, and to the continued utilisation of wharf facilities (for uses requiring riverside locations) to ensure the continued and improved use of the Thames for the transport of goods. This would provide the perfect opportunity to safeguard these sites for cargo handling and river reliant industries. Given the local and national significance of these sites, an appropriate safeguarding policy for wharf use would be beneficial.		
LPIO_164	Port of Tilbury (Perry Gladding) Via Vincent and Goring (Hannah Philips)	Ultimately, the Local Plan needs to help deliver sustainable development, in accordance with the terminology of the NPPF; a strategy which addresses the economic, social and environmental benefits of change. PoTLL are strongly of the view that this requires maintaining and enhancing the economic strengths of the Borough that arise from its location and current character whilst seeking opportunities to diversify where appropriate. Focussing on growth sectors such as distribution and green energy will be vital in order to sustain the success of the Borough in the future.	Support noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations,	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_84	Rochford District Council (Natalie Hayward)	Thurrock Borough Council should give careful consideration to its role within the context of the wider South Essex housing market area when developing its new Local Plan, particularly given its close proximity to London and Kent, access to the wider strategic road network, and presence of economic attractors including Tilbury Port, DP World and the Lakeside Basin. 6 Housing, employment and highways are considered to be strategic cross-boundary issues and Rochford District Council welcomes opportunities for both Councils to continue to engage on these issues, where appropriate, in the preparation of the respective local development plans. With regard to housing, it is recommended that Thurrock Borough Council should seek to, as far as possible, meet its objectively assessed need (OAN) based on robust and up to date evidence in accordance with the NPPF. However, as part of the Duty to Co-operate it would perhaps be prudent to also consider the scenario where neighbouring local authorities in the South Essex housing market area are unable to meet their own needs. This is particularly important given the recent publication of the Report to the Communities Secretary and to the Minister of Housing and Planning (dated March 2016), with specific reference to cross-boundary working.	Comments noted. The production of the Local Plan is being underpinned by the preparation of a wide range of need and capacity studies consistent with the policy approach and guidance set out in the NPPF and PPG. This includes the SE SHMA, the Thurrock HLAA and the Thurrock Green Belt Assessment. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.



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			Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs. At this stage in the plan-making process no evidence has been submitted to the Council which supports the need for Thurrock to allocate land to meet the future development needs of any adjoining area. Should this be the case in future the Council work with neighbouring authorities to resolve this issue through the Duty to Cooperate process.	
LPIO_422	South Ockendon Centre (Wendy Curtis)	Good transport links and health facilities.	Support noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations,	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_240	Starcourt Developments Ltd (Brian Cooke) Via Barton Wilmore (Justine Bailey)	To be considered consistent with NPPF, one of the key objectives of the Thurrock Local Plan should be to identify and update annually a supply of deliverable sites to provide five years' worth of housing against their housing requirements. The inclusion of such a principle would ensure consistency with the core planning principles set out in the NPPF. 8 The key spatial issue for Thurrock is to ensure that the dwellings required are built in appropriate locations and within appropriate, deliverable timeframes. As noted, given the high numbers of dwellings needed within the District, the Council will have to be flexible in their systematic approach to assessing the appropriate locations. It is likely that Green Belt land will have to be considered in order to meet the demand for land, and again, this should be within appropriate locations adjacent to current built development. Land within control of our	Noted. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.



Comment ID	Consultee Details	Response to question 3 - What would you like Thurrock to be like in the future and what do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?	Officer Response	Officer Action Points
		client, south of Mar Dyke, offers the opportunity to boost the rate of housing in the early years of the Plan period.	Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	
LPIO_539	Taylor Wimpey East London Via Barton Wilmore (Lauren Dooley)	Thurrock has long been a strategic location and hub for industry and growth. This should be protected and future opportunities to increase employment further encouraged. However, high demand for industrial land has ensured industrial land values have remained relatively high. This has prevented land coming forward for alternative uses such as housing. There is a need through the TLP to create a greater balance between the employment uses in Thurrock and Thurrock as a place to live. Lack of housing within Thurrock, including affordable housing, means that there are high levels of in-commuting from outside of Thurrock which is unsustainable and has a negative impact on the local economy. Further, the lack of housing forces people living in Thurrock (especially young people) to have to move outside of the Borough. The emerging TLP should therefore prioritise housing growth to seek to redress the current imbalance between industry and housing to meet the workforce needs. Sufficient infrastructure including community and health provision should be planned for alongside maximised housing growth.	Support noted. The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_524	Tenens	Thurrock has long been a strategic location and hub for	Support noted. The Council	The Council will arrange a

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	(Lakeside) Ltd Via Barton Wilmore (Lauren Dooley)	industry and growth. This should be protected and future opportunities to increase employment further encouraged.	recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_549	The Billings Group Via DHA (David Bedford)	As outlined above (Q1), the overriding ambition and vision should be to provide the homes and jobs needed. The strategic issue is therefore where the most sustainable locations for growth are and whether the Council can assist in meeting unmet need from neighbouring authorities. Any future vision statement should be meaningful and should provide clear commitment to delivery of development. We also support the prioritization of previously developed land and suggest a review of retained employment land take place to ensure that sites	Support noted. The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for

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		that no longer provides for a meaningful contribution to the local economy can be re-designated for housing.	and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	development.
LPIO_451	Vivian Humphry	Thurrock is obviously growing, but expansion must be carefully managed. Greenbelt land should be protected and pollution and health of residents are paramount concerns.	Comments noted. The Council will undertake a full Health Impact Assessment as a key element of the Integrated Assessment (SA/SEA/HIA/EqIA) being prepared in support of the Local Plan. The Council will also work in close partnership with service providers to ensure that future health and growth needs are aligned and met by the provision of improved service and facilities where it is necessary and appropriate to do.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

**Responses to Question 4**

Comment ID	Consultee Details	Response to question 4 - Do you believe that the vision and approach set out in the Core Strategy... remains the most appropriate option for meeting the Boroughs future development needs?	Officer Response	Officer Action Points
LPIO_265	Arena Leisure Enterprises Ltd (Lesley Wootten) Via GL Hearn (David Maxwell)	The vision and approach set out in the Core Strategy of focusing development to Lakeside Regional Centre is an appropriate strategy for meeting future development needs. However, the emerging Local Plan policies relating to Lakeside Regional Centre need to be strengthened to ensure that sufficient land is identified, allocated and released to deliver housing and mixed uses including community and outdoor recreation uses. The vision and approach set out in the Core Strategy should also be clarified to state that existing brownfield land to the north of Lakeside shopping centre, at Arena Essex, will be released from the Green Belt and allocated for residential and mixed uses. It is submitted that, without such clarity within the emerging Local Plan, the vision and approach to focus growth to Lakeside Regional Centre will fail.	Support noted. The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_149	Bloor Homes (Trevor Faulkner) Via GL Hearn (David Maxwell)	The vision and approach set out within the Core Strategy of focussing on Thurrock's urban area and major growth hubs is sound. However, it is apparent that the quantum of land being brought forward for new housing within the District has been restricted and restrained for a number of years. It is clear that there is a requirement to review the Green Belt boundaries in order to ensure an adequate and rolling housing land supply. It is recommended that a	Support noted The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound

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		<p>full Green Belt review is undertaken to identify suitable sites for release from the Green Belt, particularly where sites do not contribute towards the benefits of Green Belt. Particular attention should be given to brownfield/ previously developed sites within the Green Belt, such as land at Orsett Quarry. Full details of the Orsett Quarry site are set out within the accompanying Development Vision document.</p>	<p>will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.</p>	<p>plan and the allocation of individual sites for development.</p>
LPIO_365	<p>County and Suburban Properties Via Planning Works Ltd (Gary Thomas)</p>	<p>While the focus for new development is likely to remain within the urban areas and major growth hubs, the vision and approach of the Local Plan should not ignore the opportunities for the expansion of smaller settlements within the plan area, including those currently in or adjacent to the Green Belt. Built area expansion of existing settlements can be properly planned and integrated and provide for a range of housing options (amongst other uses). Such expansion can make a significant contribution, not only to achieving the necessary levels of growth required should the delivery from major sites and areas falter but also help to strengthen and support existing communities and services. These "opportunity benefits" should be given considerable weight in the Local Plan approach to providing for new development.</p>	<p>Support noted The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>

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			<p>whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.</p>	
LPIO_496	Daphne Revell	<p>Make the very best use of current Brownfield sites to ensure that developers only use these sites first and in no way encroach on the Green Belt environment at all.</p>	<p>noted The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.</p>	<p>noted The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs. Action The Council will arrange a meeting with</p>



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				the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_102	DP World - London Gateway Via Trevor Hutchinson Planning and Transportation Ltd (Trevor Hutchinson)	yes	Comments welcomed. The Council will work in partnership with the respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_195	EA Strategic Land Via Iceni Projects Ltd (David Churchill)	EASL does not agree that focussing development within Thurrock's urban area and major growth hubs remains the most appropriate option for meeting the Boroughs future development needs. This is because a key element of sustainable development is ensuring that an appropriate balance of housing, employment and infrastructure is brought forward. In previous years Thurrock has been the beneficiary of significant economic growth and inward investment, including (but not limited to) job creation in the following locations: i. Lakeside (7,000 9,000 jobs); ii. London Gateway Port and Logistics park (36,000 jobs); iii. Thames Enterprise Park (2,000 jobs); and iv. The Port of Tilbury (approx. 5,000 jobs) The failure to rebalance the spatial distribution of employment and housing growth will unfortunately mean that Thurrock only benefits from a relatively small proportion of the social and economic benefits of the employment development - yet will bear all of the environmental costs. The Council should focus its attention to analysing locational options for major development, selecting places likely to generate low trip rates and the greatest potential to offer a competitive alternative to the car. An obvious response in addressing this issue is to focus growth around key public transport hubs.	Support noted The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

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			which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	
LPIO_202	EA Strategic Land Via Icen Projects Ltd (David Churchill)	EASL does not agree that focussing development within Thurrock's urban area and major growth hubs remains the most appropriate option for meeting the Boroughs future development needs. This is because a key element of sustainable development is ensuring that an appropriate balance of housing, employment and infrastructure is brought forward. In previous years Thurrock has been the beneficiary of significant economic growth and inward investment, including (but not limited to) job creation in the following locations: i. Lakeside (7,000 9,000 jobs); i. London Gateway Port and Logistics park (36,000 jobs); i. Thames Enterprise Park (2,000 jobs); and i. The Port of Tilbury (approx. 5,000 jobs) The failure to rebalance the spatial distribution of employment and housing growth will unfortunately mean that Thurrock only benefits from a relatively small proportion of the social and economic benefits of the employment development - yet will bear all of the environmental costs. The Council should focus its attention to analysing locational options for major development, selecting places likely to generate low trip rates and the greatest potential to offer a competitive alternative to the car. An obvious response in addressing this issue is to focus growth around key public transport hubs.	Support noted The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

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LPIO_318	Ellandi LLP (Mark Robinson) Via Savills (Chris Moore)	Ellandi support the vision and approach set out within the Core Strategy and in particular that of focusing development within the main growth area of Grays. This should include an emphasis on supporting an overarching approach to reinvigorating town and local centres within the Local Authority. It is noted that such an approach is best described by the National Planning Policy Framework (NPPF) at Paragraph 23 where it is stated that Local Planning Authorities should promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres. The NPPF defines suitable main town centre uses as retail, leisure, entertainment facilities, which includes restaurants and bars, and offices. The Context to Representations section of this letter sets out the vision Ellandi has for continuing the regeneration of the Grays Shopping Centre and the Councils aspirations for the wider Town Centre. This vision is wholly consistent with the Plans current strategy and one that we would ask is maintained and supported by the new Local Plan. Changing the focus would undermine the investment plan to regenerate the Grays Shopping Centre. There are several development opportunities throughout Grays Town Centre which should be identified within the new Local Plan as part of the Town Centre Framework Masterplan / investment strategy. The Masterplan / investment strategy will assist in defining how Grays Town Centre can continue to contribute towards meeting the phased plan led need for employment, retail and housing development.	Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region including Thurrock over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_282	Environment Agency (Lizzie Griffiths)	We agree with the importance of planning for the right number of new homes and in the right locations. The regeneration of Purfleet, Grays and Tilbury will provide opportunities to improve access to and the quality of the riverside environment. However, large parts of these areas are at high risk of flooding, so there must be a robust application of the Sequential Test to avoid development in areas of flood risk wherever possible. The Plan should adhere to the recommendations of Thurrock's SFRA, SWMP and CFMP.	Support noted The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations,	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_209	Essex County Council (Lesley Stenhouse)	ECC considers this to be a reasonable approach; however, regard should be given to the outcomes arising from the new and emerging evidence and studies, as well as significant infrastructure proposals within the vicinity of the area, such as Crossrail 2 or the Lower Thames	Comments noted. Until such time as the Government makes a decision on the Lower Thames Crossing it remains difficult for the Council to plan	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the

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		Crossing which could change the dynamics of the area. For example, the eventual alignment of the Lower Thames Crossing will have significant implications for economic growth opportunities both across the area and South Essex with the creation of a range of new development opportunities which could be used to drive up the quality of development in a way that is difficult in smaller brownfield locations.	appropriately for the future development of Thurrock.	development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development
LPIO_238	Fitzpatrick Projects Ltd Via GL Hearn (David Maxwell)	The vision and approach set out by the Core Strategy of focusing development within Thurrock's urban area and major growth hubs is sound. In particular, support is given to the further growth of Lakeside Regional Centre as a place to provide new retail, leisure, jobs, and new homes. It is clear that Green Belt boundaries will need to be amended to support the future growth of Lakeside Regional Centre. It is submitted that land to the north of Lakeside shopping centre, at Arena Essex, at Ship Lane and at Brickbarn Woods, should suitably be released from the Green Belt to deliver a comprehensive extension to the Regional Centre. This will enable delivery of new homes, community and mixed uses, footpath and cycle connections to existing and proposed outdoor recreation and leisure uses. The emerging Local Plan should plan positively and proactively to realise and release adequate land for growth of the Lakeside Regional Centre.	Support noted The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_293	Gladman Developments	Q to ensure a sufficient supply of deliverable and developable sites and to meet Thurrock's objectively	Support noted The Council recognises the importance of	The Council will arrange a meeting with the respondent

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	Ltd (Phil Bamford)	assessed needs in full, we submit that the plan should be seeking to direct the growth to a broad range of sites located across all the sustainable settlements in both urban and rural areas across the borough in order to provide greater certainty that housing will be delivered whilst recognising that there will be a focus on the most sustainable settlements. 6.3 The Council should also be mindful that to maximize housing supply the widest possible range of sites, by size and market location, are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. A wider variety of sites in the widest possible range of locations ensures all types of house builder have access to suitable land which in turn increases housing delivery.	ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_253	Gravesham Borough Council (Wendy Lane)	Yes, whilst recognising that more up-to-date evidence may suggest that some additional development, i.e. small scale and community focused, would assist in some locations.	Support noted The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.



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			<p>the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.</p>	
LPIO_36	Industrial Chemicals Ltd Via Lawson Planning Partnership Ltd (Aarti O'Leary)	<p>Yes - focusing the majority of development within Thurrock's urban area and major growth hubs is currently the most appropriate development option. The financial viability constraints associated with the redevelopment of brownfield sites also needs to be addressed by the Council, by applying significant discounts to the level of affordable housing + social and physical infrastructure provision/ contributions required by CIL and/ or Section 106 planning obligations.</p>	<p>Comments noted. The Council recognises the importance of achieving the sustainable development of the Borough and ensuring that the sites allocated in the Local Plan are deliverable. The Local Plan CIL and Viability Study will inform the plan-making process and advise on the matters raised by the respondent.</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.</p>
LPIO_75	Intu Lakeside Ltd (Marc Myers) Via Nathaniel Lichfield & Partners (Stephanie Walker)	<p>The Lakeside Basin was identified within the Core Strategy 2011 as one of the five main growth areas to help create 23,000 new houses and 26,000 new jobs within the borough. Intu supports the aspiration for a prosperous economy within Thurrock and Intu Lakeside will play a significant role in delivering this aspiration in the future. The Core Strategy 2011 supports the transformation of the northern part of the Lakeside Basin over the plan period by identifying and coordinating development requirements, and complementing development with the provision of infrastructure. It is</p>	<p>Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.</p>



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		<p>recognised that a strong economy helps to create jobs and prosperity. Significant investment into the Lakeside Basin from intu, in the form of infrastructure provision and on-going development at intu Lakeside, has created a strong basis for Thurrock Council to realise its vision and aspirations for the Lakeside Basin. The further development of the Lakeside Basin as an Economic Hub will unlock development and attract further investment to the borough. The emerging Local Plan should build upon and extend the Core Strategy to support further development within the Lakeside Basin in order for it to continue to fully realise its potential as a regional centre for Thurrock and the wider economic region. We comment further on how that might be achieved in response to retail and leisure questions below. Intu Lakeside is in a strong position to continue its growth into the next plan period and Intu would like to continue to support Thurrock in realising its aspirations to create a thriving economic hub within the Lakeside Basin, supporting jobs, housing and local communities.</p>	<p>managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace. As part of the process of preparing the new Local Plan the Council will need to review the current policy approach for Lakeside and to update the quantitative projections for future retail and convenience shopping needs set out in the adopted Core Strategy. The Council has also prepared the Lakeside Development Framework and the Lakeside Transport Strategy to help inform the preparation of an Inset Plan to manage the future development of the area. Both studies are available to view on the Councils Local Plan website. The Council will engage proactively with neighbouring local authorities through the Duty to Cooperate process to ensure the proper management and development of a competitive and viable network of centres across the Thames Gateway and East London.</p>	
LPIO_5	Julian Waller	<p>Whilst the majority of future development needs should be met in the urban area and growth hubs, the contribution of smaller sites in existing built-up areas in the countryside yet close to settlements, should be acknowledged.</p>	<p>noted The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>

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			and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	
LPIO_14	Lawson Planning Partnership Ltd (Jenny Moor)	In accordance with the sustainable development objectives contained within the Framework, it is considered that new development should be focussed within sustainable locations including Thurrock's urban area and major growth hubs. However, it is considered that there will not be sufficient land in these locations to meet the Boroughs overall housing need. Therefore, additional locations for development beyond the urban areas and major growth hubs, but centred around other existing settlements, will also need to be identified in order for the Borough to meet its housing growth requirements and to be in accordance with the objective of the Framework to significantly boost housing supply. Given the large proportion of Green Belt land within the Borough, the requirement for additional sites to be allocated will inevitably result in a need for sites to be released from the Green Belt for housing. Therefore, a review of the Green Belt should be undertaken in preparing the Local Plan and appropriate sustainable sites such as our clients site at Poplars Farm, Orsett could be released for housing development. It is appropriate that any sites released from the Green Belt should be sustainably located and take account of promoting sustainable patterns of development as required by paragraph 84 of the Framework. In accordance with this, our clients site is located to the north east of and in close proximity to the Thurrock Urban Area (as identified by the Adopted Core Strategy) where the majority of the development for the Borough is concentrated. Therefore, the site is well located to a range of existing services and facilities. The site also benefits from existing frequent public transport links to both Basildon and Grays which thereafter provide further transport links, including mainline rail services into	Support noted The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

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		London.	appropriate spatial options for meeting the Boroughs future development needs.	
LPIO_351	Medway Council (Catherine Smith)	It should be noted that the Core Strategy adopted in 2011 was done so in a time before the NPPF and that is one of the key drivers for the need to produce a new Local Plan. The principles of the NPPF therefore should be enshrined in the vision of the new local plan for Thurrock. The principle of focusing growth within the urban area of Thurrock is perhaps the most effective and sustainable method, but this depends on objectively assessed need that is required and the capacity to meet this growth in these areas that needs to be tested through the outcome of the Councils latest SLAA exercise. The NPPF paragraph 151 states that: Local Plans must be prepared with the objective of contributing to the achievement of sustainable development.	Support noted The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_331	Miller Strategic Land Via MRPP (Richard Robeson)	Clearly the urban area and growth hubs remain important locations for growth. However, the Core Strategy was prepared in response to the development needs at that time (approaching 5 years since adoption and some 8 years since inception). One cannot assume those development needs remain the same (potentially shifting either by virtue of changing demand or the rate of interim	Support noted. The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin

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		<p>delivery) nor the Borough' ability to accommodate those needs. It cannot be assumed therefore that the urban area and growth hubs can accommodate necessary growth and thus alternative options must be considered.</p>	<p>economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.</p>	<p>the preparation of a sound plan and the allocation of individual sites for development.</p>
LPIO_383	Natural England (Jamie Melvin)	<p>Natural England does not disagree with this approach but the plan will need to consider whether it is possible to deliver the quantum of housing required in existing urban areas and major growth hubs without impacting on designated sites or open mosaic habitats on previously developed land, a priority habitat listed under Section 41 of the Natural Environment and Rural Communities Act 2006 (NERC Act). Priority habitats can be found on the magic website. Natural England does not hold records of priority or legally protected species but Local Records Centres may be able provide these. The plan should promote the preservation, restoration and recreation of priority habitats. When considering the re-use of brownfield land, it is important to make clear that such sites can be of high environmental value. In accordance with the NPPF, the plans development strategy should seek to avoid areas of high environmental value. Natural</p>	<p>Comments noted. The Local Plan will have a key role to play in providing an appropriate planning policy framework to safeguard and enhance the Boroughs built, natural and historic environment. The Council has commissioned an update of the evidence base to ensure that the Local Plan achieves the objectives through the proper identification of Thurrock's built, natural and historic assets and the management issues associated with each designation and site.</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>

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		England expects sufficient evidence to be provided, through the Sustainability Appraisal and HRA, to justify the site selection process and to ensure sites of least environmental value are selected. Natural England also understands that Thurrock Council is listed among a number of local authorities piloting the brownfield register. We would like to understand more about your intentions towards this approach, to more fully appreciate any implications for brownfield sites of high environmental value.		
LPIO_309	NELFT (Simon Jones) Via Ingleton Wood LLP (Abraham Laker)	NELFT support the vision set out in the Core Strategy with regard to the future provision of 23,000 new homes. NELFT provide health and child and adolescents mental health services in Essex and the north east London Boroughs of Barking and Dagenham, Havering, Redbridge, Waltham Forest. The area within their jurisdiction also includes Thurrock. Based on the foregoing, NELFT recommend that all future residential developments are supported by health facilities, in order to combat the existing health inequalities experienced at local level. It is key that social infrastructure is provided to meet the forecast population growth.	Comments noted. The Council will undertake a full Health Impact Assessment as a key element of the Integrated Assessment (SA/SEA/HIA/EqIA) being prepared in support of the Local Plan. The Council will also work in close partnership with service providers to ensure that future health and growth needs are aligned and met by the provision of improved service and facilities where it is necessary and appropriate to do.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_135	Persimmon Homes Essex (Anna Davies)	There is insufficient information at this stage to take an informed view on this matter. Thurrock Council needs to set out their targets and the options for meeting them. The proposed new Lower Thames Crossing at Tilbury will bring a number of economic benefits to the Borough and provide a more direct link to the east of Kent. It is known that Thurrock Borough Council is awaiting the announcement of the new Thames Crossing in summer 2016 before determining their preferred distribution strategy. The Council must not allow delays in the announcement of the new Lower Thames Crossing to impact on the progression of the new Local Plan. Delays in the adoption of this document will further impact on housing delivery in the Borough.	Comments noted. Until such time as the Government makes a decision on the Lower Thames Crossing it remains difficult for the Council to plan appropriately for the future development of Thurrock.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_119	Port of London Authority (Helena Payne)	the PLA would hope to see the River Thames used as a key economic support in the development of these areas. In addition, I would like to take this opportunity to highlight the PLAs support in the retention of riverside industry and employment locations, and to the continued utilisation of wharf facilities (for uses requiring riverside locations) to	Comments noted. The Council recognises the importance of the River Thames in contributing to the future economic growth and development of Thurrock. The	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust

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		ensure the continued and improved use of the Thames for the transport of goods. This would provide the perfect opportunity to safeguard these sites for cargo handling and river reliant industries. Given the local and national significance of these sites, an appropriate safeguarding policy for wharf use would be beneficial.	issues raised by the respondent will be considered by the South Essex Economic Development Needs Assessment (SE EDNA) and the Thurrock Employment Land Availability Assessment (ELAA)	evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_165	Port of Tilbury (Perry Gladding) Via Vincent and Gorbing (Hannah Philips)	PoTLL fully support the concept of identifying key hubs for major growth, one of which is, and should remain, Tilbury. These strategic hubs are clearly the most sustainable locations at which to accommodate future integrated growth that will meet economic and social needs. PoTLL considers that any other strategy such as developing new centres of development in isolated locations will not be successful nor in the best interests of the Borough.	Support noted. The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_371	Recycled in Orsett Via Icen Projects	Minerals- As referenced at para. 142 of the NPPF, minerals are essential to support sustainable economic growth and quality of life. In doing so, the NPPF (para.	Support noted. The Council has or is in the process of commissioning the technical	The Council will arrange a meeting with the respondent to discuss their



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	(Andrew Gale)	<p>145) requires minerals planning authorities to prepare an annual Local Aggregate Assessment, either individually or jointly by agreement with another planning authority. This should be based on a rolling average of 10 years' sales data and other relevant information. The NPPF also requires local minerals authorities to use landbank of aggregate minerals reserves principally as an indicator of security of aggregate minerals supply, and to indicate the additional provision that needs to be made for new aggregate extraction and alternative supplies with the Local Plan. The landbank should be maintained on a basis of 7 years for sand and gravel and 10 years for crush rock. On review of the documents available, it is our view that this key evidence base is currently out of date, and to some extent, absent. It is felt that the focus of waste facilities within the urban areas of Thurrock is not the most appropriate approach for future development and is considered to be unsound. Dansand Quarry currently has planning permission to extract Thanet Sand over the next 10 years; it is estimated that the quarry has c.750,000 tonnes of Thanet sand remaining within the site. As demonstrated within the recent planning application submission, Thanet Sand is a good fill material that compacts down well, thus particularly useful for the building trade. It is evident that in light of the recent planning consent and quantum of resource remaining within the site, that Dansand Quarry should be identified as a Preferred Site for mineral extraction within the new Local Plan. With reference to Preferred Sites, our client encourages Thurrock Council to progress a policy which only permits planning permission for mineral extraction on Preferred Sites. Minerals extraction should be restricted on other sites, and only permitted in very exceptional circumstances where it can be clearly demonstrated that the identified Preferred Sites are unable to meet the Boroughs needs. Our clients retain the view that existing mineral working locations and waste management facilities should represent the preferred location for such facilities. However, where an existing recycling or processing facility exists, it should not prevent other forms of minerals / waste development, particularly where a permission already exists. It is our view that such an approach would conflict with the principles of sustainable development. In response, our clients encourage Thurrock Council to adopt a flexible and robust approach to planning for waste capacity within the Local Plan. Future policies should allow for a reasonable level of over</p>	<p>evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations,</p>	<p>representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>

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		provision in order to respond to unforeseen reductions in provision for example, the closure of a facility. In the context of the existing operations and planning consents at Dansand Quarry, Orsett, our clients also encourage Thurrock Council to acknowledge the advantages of the colocation of a waste facility with an existing minerals facility. Previous strategies for waste facilities in Thurrock have been focussed on the location of these sites within urban areas. Our clients object to this strategic vision, as a focus on urban areas would result in an increase in heavy vehicle movements and traffic on the local highway network and residential roads. This would consequently have a detrimental effect on the amenity of existing residents. Previous sites which have been identified as strategic sites were located in high risk flood zones close to the River Thames and within major aquifer zones.		
LPIO_85	Rochford District Council (Natalie Hayward)	Rochford District Council has no specific observations to make on the vision and approach. However, the Council would like to emphasise that it is imperative that any development proposed in future iterations of the new Local Plan must be accompanied by adequate mitigation measures for the strategic road network.	Comments noted. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Essex County Council, Highways England, Network Rail, Transport for London and other transport service and infrastructure providers. This work will need to consider the impact of development on both the national and local transport networks serving the Borough.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate
LPIO_260	S & J Padfield & Partners Via Strutt and Parker LLP (James Firth)	Question 4 concerns the vision and approach of the core strategy to focus development of the main urban areas and the major growth hubs. The Council will be aware of the failure of this strategy to result in the delivery of the homes needed across the Borough between 2006 2015 as stated in the SA report. The Council should therefore seek to reduce its reliance on development within the major growth hubs and seek a more flexible approach that recognizes the ability for sites around existing settlements, which may currently be in the Green Belt, to be able to	Support noted. The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for

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		provide a quantum of the land required to meet the Councils housing and employment targets. Sustainable settlements such as South Ockendon provide particular opportunities for sustainable development well related to local services and in close proximity to sustainable transport nodes.	and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	development.
LPIO_303	SEGRO Industrial Estates Ltd Via Barton Wilmore (Gemma Johnson)	The strategy for focusing development within Thurrock's urban areas and major growth hubs is broadly supported, however it is not considered that this will be sufficient to fully accommodate the Boroughs anticipated growth requirements. As such, it will be necessary to expand these existing areas to accommodate the additional growth required across the Plan Period. The development needs of Thurrock to be delivered through the Local Plan are currently unclear. However, Paragraph 32 of the Local Plan Issues and Options (Stage 1) consultation document suggests that an additional 21,200 jobs will need to be delivered within the Borough during the period 2012 2030. This will require the delivery of a significant quantum of employment land. Five growth areas, including Purfleet, are identified at Paragraph 5 of the consultation document and it is agreed that this is an appropriate starting point for directing development through the new Local Plan. However, in order to accommodate the housing and employment needs of the Borough, it will be necessary to expand these existing urban areas and major growth	Support noted. The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

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		<p>hubs. Paragraphs 35 and 36 of the consultation document identifies the success of the key strategic growth hubs (again including Purfleet) in attracting private sector investment since the adoption of the Core Strategy in 2011. In terms of locations for employment growth, the success of these growth hubs should be capitalised on and areas immediately adjacent to them should be considered as suitable locations for meeting employment land requirements. Much of the land within the Borough outside of these areas is located within the Green Belt, which constrains significantly the options for growth, in the context of Paragraphs 87 and 88 of the National Planning Policy Framework (NPPF). It is unclear whether a Green Belt Review will be undertaken as part of the new Local Plan. Notwithstanding this, it will be necessary for the Borough Council to consider options for accommodating growth outside of the Green Belt in the first instance. It is considered that growth should be directed to Thurrock's urban areas and major growth hubs and the areas immediately adjoining them which are located outside of the Green Belt. This will ensure the most sustainable approach to meeting Thurrock's development needs across the Plan Period.</p>	<p>only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.</p>	
LPIO_190	South Essex College Via Carter Jonas (Jennifer Islip)	<p>The College considers that development should be directed to those places which are or can be made to be sustainable. This strategy is entirely consistent with paragraph 17 of the NPPF. The College agrees that the urban area and major growth hubs are appropriate options for new housing sites but considers that an overreliance on single of large sites in these areas could carry of element of planning risk in terms of delivery, particularly in light of Thurrock Council not having a 5-year housing land supply. The College therefore suggests Thurrock Council consider a more dispersed spatial strategy which directs housing growth to the larger sustainable outlying villages, such as Aveley, in addition to allocating housing sites in the urban area and major growth hubs. This approach allows for the housing needs of those in the more provincial and rural areas to be met and would assist with compliance with Paragraph 28 of the NPPF (supporting a rural economy).</p>	<p>noted. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>

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			development needs.	
LPIO_423	South Ockendon Centre (Wendy Curtis)	Uncertain	Comments welcomed. The Council will work in partnership with the respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_241	Starcourt Developments Ltd (Brian Cooke) Via Barton Wilmore (Justine Bailey)	We have some serious concerns with regards the Core Strategy and the focus on growth hubs. As demonstrated by the Councils under-delivery of dwellings, this strategy is not sufficient to meet the long term needs in the Borough. We would argue that additional small and intermediate sites need to be identified to meet the Boroughs development needs. As such to be considered consistent with NPPF, one of key objectives of the Thurrock Local Plan should be to identify and update annually a supply of deliverable sites to provide five years' worth of housing against their housing requirements. We support the identification of Purfleet as a growth hub in principle, subject to the concerns raised above. The town forms part of the Thames Gateway and has been recognised as one of the biggest areas of population growth in the UK. Purfleet close proximity to London together with its excellent transport links represent an ideal location for future housing and employment growth. Land south of Mar Dyke offers the opportunity to boost the rate of housing. The site is located in Purfleet which has been identified in the plan as a growth hub. The site offers the opportunity to provide up to 100 dwellings alongside up to 0.8 ha of employment area and other complementary commercial uses. By virtue of its location to the north of Purfleet Regeneration Area and adjacent to the A1306 Arterial Road, the site is an obvious location for sensitively located new growth. The scheme would also deliver both open market and affordable housing within walking distance of the focal point of Purfleet.	Support noted. The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.



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			meeting the Boroughs future development needs.	
LPIO_362	Strutt & Parker LLP (Richard Clews)	Question 4 concerns the vision and approach of the core strategy to focus development of the main urban areas and the major growth hubs. The Council will be aware of the failure of this strategy to provide the delivery of the homes needed across the Borough between 2006 2015 as stated in the SA report. The Council should therefore seek to reduce its reliance on development within the major growth hubs and seek a more flexible approach that recognizes the ability for sites around existing settlements, which may currently be in the Green Belt, to be able to provide a quantum of the land required to meet the Councils housing and employment targets. While the focus of the Plan should remain on Thurrock's main urban areas, the development of land surrounding existing settlements can provide demonstrable benefits to the Borough and the settlements themselves with investment and new facilities. Land at low risk of flooding and lower environmental value close to employment and transport corridors should be strongly considered in the short and medium term to off-set the delay of delivering the complex brownfield developments that have proven to be difficult to deliver.	Support noted. The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_540	Taylor Wimpey East London Via Barton Wilmore (Lauren Dooley)	We broadly agree to the five major growth hubs remaining the main focus areas for major growth within Thurrock. However, we would argue that growth should not be restricted to these settlements and that growth will be required across the Borough to be able to meet future need. In respect of Purfleet, the opportunity for growth within the existing settlement and surrounding area south of the A13 remains high. Purfleet is in a highly sustainable	Support noted. The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound



Comment ID	Consultee Details	Response to question 4 - Do you believe that the vision and approach set out in the Core Strategy... remains the most appropriate option for meeting the Boroughs future development needs?	Officer Response	Officer Action Points
		location with excellent rail links to central London. Purfleet benefits from direct river frontage, and other strong recreational opportunities including linking to the Mardyke Valley. Purfleet has the opportunity to become a highly desirable location.	will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	plan and the allocation of individual sites for development.
LPIO_525	Tenens (Lakeside) Ltd Via Barton Wilmore (Lauren Dooley)	We would argue that growth should not be restricted to these settlements and that growth will be required across the Borough to be able to meet future need.	Support noted. The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

Comment ID	Consultee Details	Response to question 4 - Do you believe that the vision and approach set out in the Core Strategy... remains the most appropriate option for meeting the Boroughs future development needs?	Officer Response	Officer Action Points
			<p>whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.</p>	
LPIO_452	Vivian Humphry	<p>Patently more housing is needed. Brownfield only options should be considered.</p>	<p>noted. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>

## Responses to Question 5

Comment ID	Consultee Details	Response to question 5 - Do you think that the plan period of 2015-2035 is appropriate?	Officer Response	Officer Action Points
LPIO_497	Daphne Revell	Things will change in a major way according to Governmental issues and I think 15 years would be more appropriate as a period to plan ahead for.	support welcomed.	No further action
LPIO_103	DP World - London Gateway Via Trevor Hutchinson Planning and Transportation Ltd (Trevor Hutchinson)	Yes	Support noted.	No further action.
LPIO_319	Ellandi LLP (Mark Robinson) Via Savills (Chris Moore)	Ellandi do not wish to specially comment on the identification of the plan period of 2015-2035 however we would stress that to be effective plans need to be kept up-to-date. National Guidance is explicit in the need for local planning authorities to review the relevance of their Local Plans at regular intervals to assess whether some or all of it may need updating. It is advised that most Local Plans are likely to require updating in whole or in part at least every five years (PPG: Paragraph 008 Reference ID: 12-008-20140306). Whilst it is entirely appropriate for the Local Authority to take a long term view of strategic issues within the confines of a broad plan period it should be equally aware that regular review is required in respect of matters not limited to but inclusive of retail.	Comments welcomed. The Council will work in partnership with the respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_210	Essex County Council (Lesley Stenhouse)	ECC considers this timeframe to be in accordance with the NPPF requirements and compatible with the South Essex emerging joint evidence, such as the South Essex Strategic Housing Market Assessment.	Comments welcomed. The Council will ensure that Essex County Council engaged in the development of the Local Plan evidence base. In doing so the Council would welcome further discussion with the County Council on the nature of the evidence base required and the opportunities for the joint - commissioning of technical work across Thurrock and South Essex.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_294	Gladman Developments Ltd (Phil Bamford)	Q5. Gladman agree that the appropriate time period for the Local Plan should be 2015-2035.	support welcomed.	no further action
LPIO_37	Industrial Chemicals Ltd	Yes, on the basis that the plan period would cover 15 years from the date of adoption of the Local Plan.	comments noted. The Council will work in partnership with the	no further action.

Comment ID	Consultee Details	Response to question 5 - Do you think that the plan period of 2015-2035 is appropriate?	Officer Response	Officer Action Points
	Via Lawson Planning Partnership Ltd (Aarti O'Leary)		respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	
LPIO_15	Lawson Planning Partnership Ltd (Jenny Moor)	There is no objection to the proposed plan period of 2015-2035 provided that the plan allows for sufficient flexibility to ensure it can meet the objectively assessed housing need for the Borough over this period. This will include the allocation of appropriate sites within the Green Belt, such as that at Poplars Farm, Orsett.	comments noted. The Council will work in partnership with the respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	No further action.
LPIO_352	Medway Council (Catherine Smith)	Yes, it is agreed that the plan period is 2015-2035 is appropriate. This is in line with that recommended in the NPPF. Paragraph 157 of the NPPF recommends a 15-year time frame.	Support welcomed	No further action
LPIO_332	Miller Strategic Via MRPP (Richard Robeson)	An end-date of 2035 is appropriate on the basis of adoption in 2020 (i.e., consistent with Para 157.2 of the NPPF). However, we are increasingly concerned about the lack of progress made since the announcement in February 2014 that the Council would prepare a new Plan. Not only is a replacement Plan urgently required (given the limited scope of the adopted CS and age of the saved UDP), Government guidance and recent statements and clarifications confirm the urgency now attached to having an up to date plan in place. Progress over substance is now the absolute emphasis.	Comments noted. The Council will work in partnership with the respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate
LPIO_310	NELFT (Simon Jones) Via Ingleton Wood LLP (Abraham Laker)	NELFT are supportive of the plan period of 2015 - 2035	Support welcomed.	No further action
LPIO_136	Persimmon Homes Essex (Anna Davies)	Paragraph 157 of the NPPF states that Local Plans should be drawn up over an appropriate time scale, preferably a 15-year time horizon, take count of longer term requirements, and be kept up to date. Thurrock Borough Council targets adoption of the new Local Plan in 2020 and therefore a plan period up to 2035 must be provided as a minimum. Should the council see further slippage in the progression of their new Local Plan then the plan period should be adjusted accordingly.	Comments noted. The Council will work in partnership with the respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	No further action.
LPIO_166	Port of Tilbury (Perry Gladding) Via	PoTLL consider that a timeframe for the plan of 2015 2035 is appropriate. It is sufficiently long in order to allow for proper long term planning of the Borough, including	Support welcomed.	no further action

<b>Comment ID</b>	<b>Consultee Details</b>	<b>Response to question 5 - Do you think that the plan period of 2015-2035 is appropriate?</b>	<b>Officer Response</b>	<b>Officer Action Points</b>
	Vincent and Goring (Hannah Philips)	infrastructure needs. It is, however, inevitable, that there will be a need to monitor and review the plan in order to address changing circumstances, before 2035.		
LPIO_86	Rochford District Council (Natalie Hayward)	Rochford District Council has no specific observations to make on the proposed plan period. However, it should be noted that paragraph 83 of the NPPF emphasises that authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.	noted. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_363	Strutt & Parker LLP (Richard Clews)	The Plan Period is considered to be appropriate.	support welcomed	no further action
LPIO_541	Taylor Wimpey East London Via Barton Wilmore (Lauren Dooley)	Whilst we have no objection to a plan period of 2015-2035, a more appropriate period might be 2016-2036 given that work on the TLP has substantially begun this year.	Comments welcomed. The Council will work in partnership with the respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_526	Tenens (Lakeside) Ltd Via Barton Wilmore (Lauren Dooley)	Whilst we have no objection to a plan period of 2015-2035, a more appropriate period might be 2016-2036 given that work on the TLP has substantially begun this year.	Comments welcomed. The Council will work in partnership with the respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.

**Responses to Question 6**

<b>Comment ID</b>	<b>Consultee Details</b>	<b>Response to question 6 - What would you change in your local neighbourhood to make it a better place to live?</b>	<b>Officer Response</b>	<b>Officer Action Points</b>
LPIO_470	Anthony Newell	The roads in our housing estates are becoming congested with parked cars as many families own more than one care and therefore park on the road. Where possible turn grass verges into parking areas. School parking on my estate during school term makes it difficult to get off the estate due to the parking and volume of traffic. I appreciate the need for parents to use their cares to drop off their children. So there is a need to address this problem where possible. Tree tops school is a good example of where there is plenty of parking for parents. It is less stressful for the parents if they do not have to worry about parking.	Comments welcomed. The Council will ensure that the respondent and other stakeholders are fully engaged in the development of the Local Plan evidence base.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_498	Daphne Revell	Would wish to see some leisure facilities or youth activities here in Chadwell St Mary as we have nothing going on here for them to do or enjoy. We need some Adult exercise equipment on the heath Road site which would be a good start. Also a youth club or hub would be an excellent exercise to help our area's youth development.	Comments noted. The Council is preparing a new Active Place Strategy which will identify proposals to improve the nature, quality and provision of leisure and recreational facilities across the whole of Thurrock. The Strategy which is being prepared jointly with Sport England will also identify priorities for funding and will help inform the preparation of the Local Plan including policies to protect open space, including football pitches, from development and to obtain additional funding from developers to maintain and enhance both new and existing leisure opportunities.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_196	EA Strategic Land Via Iceni Projects Ltd (David Churchill)	The requirement to provide for a greater level of growth should result in a decision to maximise the opportunities presented by locations such as land south of West Horndon as a strategic growth location. The land should be identified due to its accessibility to rail and transport infrastructure, accessibility to a range of local shops and community facilities as well as its potential to improve public realm, the ability to provide green space and strengthen the village centre. Critically, as noted previously its identification has been justified by the evidence presented in the outcomes of previous consultations by Brentwood Borough Council. The	Support noted. The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.



Comment ID	Consultee Details	Response to question 6 - What would you change in your local neighbourhood to make it a better place to live?	Officer Response	Officer Action Points
		<p>settlement of West Horndon provides opportunities to address a number of concerns outlined in this section of the consultation document, in particular providing flexibility in deciding where new homes should go; and what types of homes to build. In deciding where new homes should go, growth at West Horndon would support the national objectives described at paragraphs 15 and 16 of the consultation document which seeks to encourage sustainable patterns of movement and thus ensuring that new housing is properly serviced by existing infrastructure. As per paragraph 17, EASL responded to the Councils call for sites exercise and took the opportunity to outline the key benefits of the land south of West Horndon. We look forward to receiving the Councils feedback in Summer 2016.</p>	<p>the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.</p>	
LPIO_203	EA Strategic Land Via Icen Projects Ltd (David Churchill)	<p>The requirement to provide for a greater level of growth should result in a decision to maximise the opportunities presented by locations such as land north of St. Marys Lane as a strategic growth location. The land should be identified due to its accessibility to rail and transport infrastructure, accessibility to a range of local shops and community facilities as well as its potential to improve public realm, the ability to provide green space and strengthen the village centre. Critically, as noted previously its identification has been justified by the evidence presented in the outcomes of previous consultations by Brentwood Borough Council. The settlement of West Horndon provides opportunities to address a number of concerns outlined in this section of the consultation document, in particular providing flexibility in deciding where new homes should go; and what types of homes to build. In deciding where new homes should go, growth at West Horndon would support the national objectives described at paragraphs 15 and 16 of the consultation document which seeks to encourage sustainable patterns of movement and thus ensuring that new housing is properly serviced by existing infrastructure. As per paragraph 17, EASL responded to the Councils call for sites exercise and took the</p>	<p>Support noted. The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>

Comment ID	Consultee Details	Response to question 6 - What would you change in your local neighbourhood to make it a better place to live?	Officer Response	Officer Action Points
		opportunity to outline the key benefits of the land north of St. Marys Lane. We look forward to receiving the Councils feedback in Summer 2016.	land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	
LPIO_154	Essex Bridleways Association (Sue Dobson)	Increased access opportunities for all users and better connectivity to the rights of way network, including safer crossings over major roads and railways.	Comments noted. The Council has commissioned a number of technical studies designed to update the Green Grid Strategy. These include the development of an Active Travel Strategy which will address the issues raised by the respondent.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_532	George Watts	i) Maintain the roads, footpaths, green verges, etc. to a higher standard. ii) Use hard or soft landscaping to improve small areas that attract litter/dumping iii) Improve road sweeping rotas. Resist overdevelopment and infill and / or back garden type development that do not conform to the general street scene. Ensure good car parking at local shopping parades. Have proper facilities for young people and encourage all age participation in a wide range of clubs. Promote civic pride. Strengthen Community Forums.	Comments welcomed. The Council will ensure that the respondent and other stakeholders are fully engaged in the development of the Local Plan evidence base.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_406	Historic England (Michael Stubbs)	Paragraph 6 of the consultation document deals with the importance of heritage assets and mentions Coalhouse Fort and Tilbury Fort (both scheduled monuments). As acknowledged in the adopted Core Strategy the environmental quality of the riverscape and surrounding areas is important and forms a key asset. The Core Strategy makes the important point that The character of a place or area is derived from the recognisable and consistent patterns of natural, historic and built elements within it (paragraph 5.140 of the Core Strategy). Characterisation work can greatly assist in understanding the historic evolution of the landscape and in helping to inform new policy. Historic England recommends greater elaboration of the riverscape heritage within paragraph 6	Comments welcomed. The Council will work in partnership with the respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

Comment ID	Consultee Details	Response to question 6 - What would you change in your local neighbourhood to make it a better place to live?	Officer Response	Officer Action Points
		and reference to further work that will inform the evidence base as the plan progresses.		
LPIO_38	Industrial Chemicals Ltd Via Lawson Planning Partnership Ltd (Aarti O'Leary)	No observations at this stage.	noted.	no further action
LPIO_16	Lawson Planning Partnership Ltd (Jenny Moor)	Development of our clients site at Poplars Farm, Orsett would create an attractive and sustainable development that would make a valuable contribution to meeting the Boroughs housing needs and in turn would assist in making the Borough a better place to live.		
LPIO_182	Local Access Forum (Sue Dobson)	Safe off-road access where practicable for all vulnerable road users and user groups.	Comments noted. The Council has commissioned a number of technical studies designed to update the Green Grid Strategy. These include the development of an Active Travel Strategy which will address the issues raised by the respondent.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_333	Miller Strategic Land Via MRPP (Richard Robeson)	Question clearly aimed at local residents. However, critical that all neighbourhoods are given access to essential services and facilities. The Local Plan therefore has a critical role in terms of identifying infrastructure deficits and planning to address them. Policies must also ensure that new development both caters for its own needs and helps to ensure the sustainability of existing provision. An updated Infrastructure Deficit Assessment is notably absent from the Council's proposed evidence-base.	Support noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_384	Natural England (Jamie Melvin)	The plan covers many geographical locations that we consider would benefit from enhanced Green Infrastructure provision. Green infrastructure refers to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to provide multiple benefits including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation, food production, wildlife habitats and health & well-being improvements provided by trees, rights of way, parks, gardens, road verges, allotments, cemeteries,	Comments welcomed. The Council will work in partnership with the respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.

Comment ID	Consultee Details	Response to question 6 - What would you change in your local neighbourhood to make it a better place to live?	Officer Response	Officer Action Points
		woodlands, rivers and wetlands. Recognition should be given to the value of rights of way and access to the natural environment in relation to health and wellbeing and links to the wider green infrastructure network. The plan should seek to link existing rights of way where possible, and provide for new access. The plan should make provision for appropriate quantity and quality of green space to meet identified local needs as outlined in paragraph 73 of the NPPF. Natural England's work on Accessible Natural Greenspace Standard (ANGSt) may be of use in assessing current level of accessible natural greenspace and planning improved provision.		
LPIO_87	Rochford District Council (Natalie Hayward)	Rochford District Council has no specific observations to make.	noted.	no further action
LPIO_424	South Ockendon Centre (Wendy Curtis)	Provide more leisure facilities encouraging all ages to utilise them.	Comments noted. The Council is preparing a new Active Place Strategy which will identify proposals to improve the nature, quality and provision of leisure and recreational facilities across the whole of Thurrock. The Strategy which is being prepared jointly with Sport England will also identify priorities for funding and will help inform the preparation of the Local Plan including policies to protect open space, including football pitches, from development and to obtain additional funding from developers to maintain and enhance both new and existing leisure opportunities	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_550	The Billings Group Via DHA (David Bedford)	We consider that Chadwell St Mary could be improved as a consequence of a comprehensive redevelopment of our client's land. We propose to replace a poor quality and largely outdated commercial use with a well planned residential development. Such a change would displace uses that are inappropriate to the context of the largely residential area and that currently have an adverse impact in respect of noise, disturbance and vehicular movements.	Comments welcomed. The Council will work in partnership with the respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to

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				Cooperate.

## Responses to Question 7

Comment ID	Consultee Details	Response to question 7 - How would you make the best use of the River Thames and its foreshore?	Officer Response	Officer Action Points
LPIO_471	Anthony Newell	I would like to see the river Thames utilised more for the conveyance of Freight. Also a commuter ferry service running from Southend to London. Protect the Tilbury Gravesend Ferry. Develop Grays Beach. Bigger yachting marina ensure adequate and managed walkaways along the Thames.	Support noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations,	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_499	Daphne Revell	Open up more areas for public enjoyment of our riverside areas & not so much industrial use. Also to make arrangements to use the river for transport use get a ferry or weekend trips to London/ Southend etc. it would be a great way to use & travel around & could use the existing Tilbury Ferry like a lot more. Also promote youngsters use of the river for sailing etc., & wild life interaction / education uses.	Comments noted. The Local Plan will have a key role to play in providing an appropriate planning policy framework to safeguard and enhance the Boroughs built, natural and historic environment. The Council has commissioned an update of the evidence base to ensure that the Local Plan achieves the objectives through the proper identification of Thurrock's built, natural and historic assets and the management issues associated with each designation and site.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_283	Environment Agency (Lizzie Griffiths)	The River Thames is an extremely valuable watercourse and there should be no encroachment into the river or onto the foreshore by development. All riverside development should be sensitive to ecological concerns and be innovative in the design of associated flood defences to ensure softer edges to the rivers and compliance with the WFD. Moving forward, the plan should align with TE2100 objectives and aspirations for the riverside frontage. Other ecological concerns for the Thames are improving water quality and fish and invertebrate populations. Options for improving riverside access for the public should be sought from new developments, provided there are no conflicting wildlife interests or flood risk management aspirations.	Comments welcomed. The Council will work in partnership with the respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_155	Essex Bridleways Association	Increased access for all user groups where practicable	Support noted. The Council has or is in the process of commissioning the technical	The Council will arrange a meeting with the respondent to discuss their



Comment ID	Consultee Details	Response to question 7 - How would you make the best use of the River Thames and its foreshore?	Officer Response	Officer Action Points
	(Sue Dobson)		evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations,	representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_211	Essex County Council (Lesley Stenhouse)	ECC agree that the character and value of the River Thames should be embedded within the strategy, to recognise its economic importance as well as its potential socio and environmental value. Regard should be had to the current river borne developments and opportunities such as links between existing cruise terminal and the Paramount proposal within Kent; as well as wider environmental / recreational opportunities to link to the Thames Estuary Path. At present the Thames Estuary Footpath runs partly through Thurrock (Tilbury to Leigh); which also has the potential to connect to the wider Essex Coastal footpath to the east proposed by Natural England and ECC, and to connect to the London Thames paths to the west. Thurrock Council may wish to include a strategic level policy, which would require the comprehensive consideration of the landscape and green spaces as part of a wider green and blue (rivers, estuary) network. It is considered that such a policy would need to highlight the multifunctional role of these green spaces for biodiversity, recreation, amenities connection, surface water management and climate change adaptation. The policy could require all new development proposals to create and enhance green spaces and seek to link together green networks where appropriate, whilst protecting this environment. Any proposals should look to enhance green open spaces and corridors to contribute positively to the landscape and visual amenity value (i.e. health and wellbeing benefits, sustainable travel and potential tourism) of the green space.	Comments noted. The Council recognises the importance of the River Thames in contributing to the future economic growth and development of Thurrock. The issues raised by the respondent will be considered by the South Essex Economic Development Needs Assessment (SE EDNA) and the Thurrock Employment Land Availability Assessment (ELAA) The Council will ensure that Essex County Council engaged in the development of the Local Plan evidence base. In doing so the Council would welcome further discussion with the County Council on the nature of the evidence base required and the opportunities for the joint - commissioning of technical work across Thurrock and South Essex.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate
LPIO_533	George Watts	People love to be by the sea and there is terrific potential in developing Purfleet, Grays and Stanford as beaches. Marinas have been suggested many times over the years and yet none have proceeded it's about time at least one was established. There is also scope for river tours for pleasure /family occasions, with a without dining on board. The riverside would also lend itself to tourism, the sitting of a museum with the history of London docks, training ships, power and /or cement industries might be explored. We have failed miserably to exploit the history of the Elizabethan Amada encampment at Tilbury (in 1588)	Comments noted. The Local Plan will have a key role to play in providing an appropriate planning policy framework to safeguard and enhance the Boroughs built, natural and historic environment. The Council has commissioned an update of the evidence base to ensure that the Local Plan achieves the objectives through	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

Comment ID	Consultee Details	Response to question 7 - How would you make the best use of the River Thames and its foreshore?	Officer Response	Officer Action Points
		where is the annual celebrations festival that sees the downriver journey made by the queen on her barge, and the making of her great speech, etc. etc. Nottingham promotes itself as the Robin Hood County why doesn't Elizabethan Thurrock do the same.	the proper identification of Thurrock's built, natural and historic assets and the management issues associated with each designation and site.	
LPIO_418	Greater London Authority (Jorn Peters)	In terms of the use of the River Thames and the importance of Thurrock's ports also for London, emerging Local Plan policies should be co-ordinated with relevant strategic policy positions within London. It is also important to ensure sustainable and reliable freight access. Proposals for the Lower Thames Crossing, which the Mayor is broadly supporting, are also strategically important for Thurrock.	Comments noted. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Essex County Council, Highways England, Network Rail, Transport for London and other transport service and infrastructure providers. This work will need to consider the impact of development on both the national and local transport networks serving the Borough.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_39	Industrial Chemicals Ltd Via Lawson Planning Partnership Ltd (Aarti O'Leary)	The role of the River Thames in serving commercial and industrial uses with jetty facilities is important and should be encouraged by the Plan, as it contributes to balancing the need for goods consignments to be transported by road. The growth of port facilities in the Borough needs to be supported by additional HGV parking facilities to serve the logistics and freight forwarding sectors on which the ports and major local employers rely.	Comments noted. The Council recognises the importance of the River Thames in contributing to the future economic growth and development of Thurrock. The issues raised by the respondent will be considered by the South Essex Economic Development Needs Assessment (SE EDNA) and the Thurrock Employment Land Availability Assessment (ELAA)	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_353	Medway Council (Catherine Smith)	As an authority that also adjoins the River Thames, Medway Council also recognises the significance of the River Thames for its environmental, economic and environmental role that it has to play on the surrounding area. Any approach that is chosen should be all encompassing so that protects habitats and secures jobs. Medway Council welcomes the opportunity to work with Thurrock in planning at a landscape scale for the Thames. We would support continuing partnership working developing from the Thames Estuary Local Nature	Comments welcomed. The Council will work in partnership with the respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to

Comment ID	Consultee Details	Response to question 7 - How would you make the best use of the River Thames and its foreshore?	Officer Response	Officer Action Points
		Partnership and links to strategic environmental projects such as the implementation of the England Coastal Path and, measures to mitigate the impact of development and potential of recreational pressure on designated landscapes. As a part of the above approach it may be worth opening a dialogue with the Thames Gateway Kent Partnership. This organisation could provide Thurrock Council with a strategic overview of issues and projects for regeneration on the south side of the Thames in Kent.		Cooperate
LPIO_334	Miller Strategic Land Via MRPP (Richard Robeson)	The Thames frontage provides an important opportunity for new development. However, this must not be at the expense of existing commercial operations and must take full consideration of the flood risk, environmental sensitivity and other constraints.	Support noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations,	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_385	Natural England (Jamie Melvin)	Natural England encourages access to the natural environment as a general principle and acknowledges the value and potential of the River Thames for Thurrock. We are pleased to see reference made to the need to protect and enhance key environmental and ecological assets along the River as there are current pinch-points that are likely to require local access solutions, to ensure sensitive nature conservation interests are not compromised. The Plan should also reference Nature Improvement Areas (NIAs) and consider specifying appropriate types of development within them. NIAs can provide a focal point for creating more and better-connected habitats. Where housing allocations are proposed in the environs of NIAs opportunities to contribute to habitat enhancement should be explored. Planning positively for ecological networks will contribute towards a strategic approach for the creation, protection, enhancement and management of green infrastructure, as identified in paragraph 114 of the NPPF.	Comments welcomed. The Council will work in partnership with the respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_120	Port of London Authority (Helena Payne)	River Thames as advised above, it is important that the River Thames is embedded within a strategy, as part of the new Local Plan, which recognises and exploits the opportunities provided by the Boroughs location by the river. It is also important that the protection and enhancement of the distinctive riverscape is incorporated within these river related policies. The river is also an important natural habitat and also includes a number of heritage assets, which should be preserved. In response to question 7, the new Local Plan, provides the Borough the opportunity to adhere to the aims and objectives of the	Support noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations,	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

Comment ID	Consultee Details	Response to question 7 - How would you make the best use of the River Thames and its foreshore?	Officer Response	Officer Action Points
		Thames Vision. The Thames Vision is about planning for the rivers future, so that we can make the most of its potential, for the benefit of all. The Vision seeks to consider all Thames uses together: trade, travel, leisure and pleasure. The new Local Plan for Thurrock, should seek to promote the river in the same way, setting a growing river use in its context as a great natural asset, which must be conserved and improved in terms of its water quality, wildlife and attractiveness as an open space. The Boroughs intentions set out in paragraphs 7 to 9 are welcomed. It is especially pleasing to see that in going forward, priorities around the development of the river and its foreshore, which will vary depending on location, will lend themselves to different opportunities. Whether that is maximising the potential of the ports, promoting and protecting the environment, creating an attractive place to live or encouraging people to travel by river.		
LPIO_167	Port of Tilbury (Perry Gladding) Via Vincent and Gorbing (Hannah Philips)	Clearly, one of the key priorities of the Local Plan must be to maximise the benefit of the Thames-side location of the Borough. It is appreciated that this benefit is recreational, ecological as well as economic. However, the key role of the Port in the local and sub-regional economy is such that the Local Plan needs to allow PoTLL to be able to make the best use of the riverside areas at the current docks, and the proposed expansion of the port at the site of the former Tilbury Power Station (Tilbury 2). It needs to recognise the primary role and economic importance of the river. That said, opportunities for increasing accessibility and connectivity may well present themselves in some locations as part of wider masterplanning of the riverside areas, and it is clearly important to ensure that the opportunities to enhance the wider community role of the river are taken where such opportunities are aligned with the importance of the river to future economic success.	comments supported. The Council recognises the importance of the River Thames in contributing to the future economic growth and development of Thurrock. The issues raised by the respondent will be considered by the South Essex Economic Development Needs Assessment (SE EDNA) and the Thurrock Employment Land Availability Assessment (ELAA)	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_425	South Ockendon Centre (Wendy Curtis)	After visiting the Kent side of the river and seeing how nice they have planned the area. I am certain we could take a leaf out of their book to improve the area.	Support noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_453	Vivian	the industries, major ports, etc. that make the most profit	comments noted. The Council	The Council will arrange a

Comment ID	Consultee Details	Response to question 7 - How would you make the best use of the River Thames and its foreshore?	Officer Response	Officer Action Points
	Humphry	from the river should bear heavy responsibility to ensure the unspoilt parts are fit for wildlife to thrive and to enable residents to enjoy them for leisure.	is preparing a new Active Place Strategy which will identify proposals to improve the nature, quality and provision of leisure and recreational facilities across the whole of Thurrock. The Strategy which is being prepared jointly with Sport England will also identify priorities for funding and will help inform the preparation of the Local Plan including policies to protect open space, including football pitches, from development and to obtain additional funding from developers to maintain and enhance both new and existing leisure opportunities.	meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan

## Responses to Question 8

Comment ID	Consultee Details	Response to question 8 - Have you ever experienced any difficulty in trying to find a suitable property in the Borough?	Officer Response	Officer Action Points
LPIO_472	Anthony Newell	Not applicable to us when we purchased our property it was a lot easier than it is today. Plenty of choice at reasonable price. today it is very difficult if not impossible for young people to get on the property market.	Comments noted.	No further action.
LPIO_234	Home Builders Federation Ltd (James Stevens)	We note that the South Essex SHMA has still to be published. It is good to see that the Council has acknowledged the difference between question of capacity and the objectively assessed housing needs (OAN) of the district. Paragraph 14 is positively worded and demonstrates the Councils admirable commitment to planning to meet housing needs and its concern about the unaffordability of housing for many groups of the population. We are pleased to read that the Council intends to address its OAN in full. In identifying the correct number of homes to be provided over the plan period, we would expect the Council consider carefully the question of short term versus long term migration trends. A longer-term migration trend can give the impression of providing a more robust basis for assessing the demographic element of the OAN calculation, but a shorter-term five-year trend, as used by the ONS and DCLG for their population and household projections, may in fact prove more reliable as a projection in the light of the circumstances in London and its boom in population but inability to house that population increase. This will include taking into account the Mayor of London's migration assumptions. The Council may wish to take note of the recent advice to Government by the Local Plans Expert Group on the use of migration trends. I referred to these factors at a South Essex SHMA engagement debate last year. We would also query the necessity of any adjustment made for Unattributable Population Change (UPC). The HBF considers that such adjustments are unjustified regardless of whether they have a positive or negative affect on the household projections. The ONS does not adjust for UPC. The effects of adjustment are likely to be relatively small in any case and their importance will be marginal given the general in-exactitude of the projections.	Comments noted. The production of the Local Plan is being underpinned by the preparation of a wide range of need and capacity studies consistent with the policy approach and guidance set out in the NPPF and PPG. This includes the SE SHMA, the Thurrock HLAA and the Thurrock Green Belt Assessment. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs. At this stage in the plan-making process no evidence has been submitted to the Council which supports the need for Thurrock to allocate land to meet the future development needs of any adjoining area. Should this be the case in future the Council work with neighbouring authorities to resolve this issue through the Duty to Cooperate	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development



			process.	
LPIO_40	Industrial Chemicals Ltd Via Lawson Planning Partnership Ltd (Aarti O'Leary)	Due to the serious under provision of housing against previous Local Plan and Core Strategy targets since 2001, there is an urgent need to identify a range of new land (including major sites) for housing within the Boroughs urban areas. Please refer to LPPs accompanying Statement which identifies a range of deliverable housing sites to help meet the Boroughs needs. The objectively assessed housing need must remedy the negative impact which has arisen from continued and marked housing completion deficits since 200	Comments noted. The South Essex Housing Market Assessment (SHMA) will provide evidence of the need for new housing in the Borough and the types of housing required to meet the Thurrock's Objectively Assessed Housing Need (OAN) in full. The Thurrock Housing Land Availability Assessment (HLAA) will consider the planning merits of the respondents site and the outcome of this process will inform any future decisions on whether to allocate the site(s) in the Local Plan for development.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_17	Lawson Planning Partnership Ltd (Jenny Moor)	Thurrock Council has persistently under delivered against their Core Strategy housing target, resulting in a cumulative shortfall of 6,338 dwellings between 2001 and 2015. This has resulted in a considerable under provision of housing within the Borough and this will not be resolved without sufficient sites being allocated within the new Local Plan to both address the existing shortfall and plan for future housing requirements. The Council are currently unable to demonstrate a five-year supply of deliverable housing sites and given the persistent under delivery, are required to apply the 20% buffer in accordance with the Framework. The latest information published by the Council in relation to their housing land supply is the 2014 Authority Monitoring Report, where the Council indicated they had a 5-year supply of deliverable housing sites including the 20% buffer. Therefore, there is an evident need for suitable sites to come forward for development and our clients site would make a valuable contribution to meeting this need.	Comments noted. The South Essex Housing Market Assessment (SHMA) will provide evidence of the need for new housing in the Borough and the types of housing required to meet the Thurrock's Objectively Assessed Housing Need (OAN) in full. The Thurrock Housing Land Availability Assessment (HLAA) will consider the planning merits of the respondents site and the outcome of this process will inform any future decisions on whether to allocate the site(s) in the Local Plan for development.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_168	Port of Tilbury (Perry Gladding) Via Vincent and Gorbing (Hannah Philips)	PoTLL fully support the comment in the document that preventing further housing growth is not an option; future housing needs must be satisfied in a sustainable manner. Providing new homes is not only a civic duty placed on the Council from national government, but has important economic and environmental implications. Future economic development is reliant on the local supply of labour being maintained and enhanced. Failure to meet local housing needs will potentially act as a brake on growth, increase house prices and undermine affordability, and/or will encourage longer distance commuting to the growth hubs of the Borough, including Tilbury, with adverse environmental consequences. Whilst there are brownfield development opportunities, PoTLL	noted. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

		are of the view that the Council will need to positively look at the most appropriate way of meeting housing needs, and in so doing take a long term view on reviewing Green Belt boundaries.	cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	
LPIO_426	South Ockendon Centre (Wendy Curtis)	No	Comments noted.	no further action
LPIO_271	Southend Borough Council (Matthew Thomas)	Housing Southend Borough Council notes in paragraph 14 of the Draft Thurrock Local Plan that Thurrock states that it must seek to plan for our full OAN over the plan period. Southend Borough Council would be supportive of Thurrock plan to meet its own objectively assessed need figure, which should allow for demographic needs to be accommodated including an inflow of migrants from London and support assessed likely levels of economic growth in the Borough. The level of assessed need should also respond to market signals in the Borough. Thurrock should also ensure that an identified housing requirement at later stages of plan preparation would need to truly reflect full objectively assessed need for Thurrock, especially with regards to realising the wider economic potential of South Essex. Southend Borough Council would also highlight the need for the Thurrock draft Local Plan to consider whether it may need to make provision with it the plan to assist other more constrained neighbouring authorities within the housing market area to meet their unmet need, in accordance with national policy To this effect Southend Borough Council would seek the Thurrock draft Local Plan to support a level of housing growth that would enable the objectively assessed housing need of the south Essex housing market area to be met. The Plan should be open and responsive to the potential effects of a greater level of housing provision as a consequence of neighbouring authorities being unable to legitimately meet their own needs under the legal duty to cooperate. The duty to cooperate provides a mechanism for strategic matters to be addressed to ensure that development needs are planned for on a wider than local basis. Moreover, it enables local authorities that are confronted by particular environmental and geographic constraints to address their development needs. Thurrock Council will be aware that it is not sufficient for local planning authorities to demonstrate that they have discussed or considered the issues without	Comments noted. The production of the Local Plan is being underpinned by the preparation of a wide range of need and capacity studies consistent with the policy approach and guidance set out in the NPPF and PPG. This includes the SE SHMA, the Thurrock HLAA and the Thurrock Green Belt Assessment. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs. At this stage in the plan-making process no evidence has been submitted to the Council which supports the need for Thurrock to allocate land to meet the future development needs of any adjoining area. Should this	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.

	<p>there being a practical result or meaningful outcome. All Councils within the South Essex housing market area are, and will be faced, therefore, with an inextricably interwoven challenge, where they will need to have demonstrated that in preparing their respective Plans, that they have exhausted the route of cooperative planning through the Duty to Cooperate, before submitting a Plan that doesn't meet in full its objective assessed housing need or considered the needs of neighbouring authorities, which cannot meet their own need. Paragraph 182 of the NPPF states that the plans should consider unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. In summary, national policy and guidance is clear that a local plan should: prepare a SHMA to assess full housing needs provide a delivery strategy that is clear in terms of where, when and how housing need will be delivered over the full plan period meet full, objectively assessed housing need for market and affordable housing meet the legal duty to cooperate and incorporate allowances for unmet requirements from neighbouring authorities where it is reasonable to do so; and boost significantly the supply of housing and ensure a deliverable five year housing land supply with an appropriate buffer can be maintained at all times. As there is an apparent pressing need for housing within South Essex and beyond, it would seem appropriate that a comprehensive housing strategy is developed and agreed as to where and how housing need may be sustainably met and delivered across the sub-region, and to understand the best strategic approach to achieve this, so that any potential unmet housing need is addressed holistically and cohesively, and the duty to cooperate effectively dispatched across the housing market area.</p>	<p>be the case in future the Council work with neighbouring authorities to resolve this issue through the Duty to Cooperate process.</p>	
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Responses to Question 9

ID	Full Name	Question 9 - What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing need?	Officer Response	Officer Action Points
LPIO_473	Anthony Newell	I think every effort should be made to protect Green Belt land. However, I appreciate pressure from the Government will not allow this. If Green Belt land is used, then the sites selected where possible should be those sites that have less impact on local residents.	noted. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_266	Arena Leisure Enterprises Ltd (Lesley Wootten) Via GL Hearn (David Maxwell)	Thurrock Council should prioritise the development of brownfield sites to accord with the government's emerging requirement for local authorities to prepare brownfield land registers. The Housing and Planning Bill 2015 indicates that suitable brownfield land, including brownfield land within the Green Belt, should be included on local brownfield land registers. Where sites are included on a brownfield land register then a 'permission in principle' (PIP) will apply, the details and mechanisms for such PIP's for which have still to be confirmed. It is submitted that Thurrock should carry out a thorough assessment of brownfield land suitable for housing, before then considering greenfield sites. Particular attention should be given, through the register, to the suitability of sites adjacent to Lakeside Regional Centre, such as Arena Essex, that can contribute towards the delivery of at least 3,000 dwellings at Lakeside. Arena Essex clearly represents brownfield land and the site should be included within the Thurrock brownfield land register. There are a range and variety of existing buildings, structures and	noted. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

ID	Full Name	Question 9 - What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing need?	Officer Response	Officer Action Points
		extensive areas of hard-standing covering a majority of the Arena Essex site. There are also areas of hard-standing and previously developed land at Arena Essex that have not blended back in to the landscape. Existing buildings and structures at Arena Essex include: motor racing stadium; hardstanding race pits; hard-standing car parks; scrambling track; workshops, shower/toilets; block; ticket offices; medical hut; raceway tavern; retail kiosks; go-kart track; mobile telephone masts and a residential bungalow. The Arena Essex should therefore be categorised as brownfield land.	and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	
LPIO_150	Bloor Homes (Trevor Faulkner) Via GL Hearn (David Maxwell)	There remains suitable brownfield (previously developed) sites within Thurrock District with good access to existing services for new housing, capable of delivering significant housing and mixed use development. Land at Orsett Quarry remains a highly suitable brownfield and previously developed site that can deliver new homes for sale and rent, new and improved community facilities accessible to the existing Southfields community, employment development suitable for small and start-up businesses and publicly accessible open space. Thurrock Council should identify land at Orsett Quarry within the Council's brownfield land register as well as through an adjustment to the Green Belt and as a residential allocation in the emerging Local Plan.	Support noted. The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_144	Chelmsford	The commitment to seek to meet Thurrock's housing	Support welcomed	No further action.

ID	Full Name	Question 9 - What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing need?	Officer Response	Officer Action Points
	City Council (Jeremy Potter)	needs, within the Thurrock Councils boundaries is welcomed.		
LPIO_368	County and Suburban Properties Via Planning Works Ltd (Gary Thomas)	While national policy prioritises the development of brownfield sites, this inevitably brings its own issues at a local level relating to delivering and developing such sites in the required timescale. If suitable sites do not exist and are not available and/or deliverable, the key alternative is considered to be non-brownfield sites throughout the whole of the plan area. Such sites are often free from the constraints and costs associated with the issues of developing of brownfield sites and overall are likely to lead to the speedier delivery of housing	noted. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_366	County and Suburban Properties Via Planning Works Ltd (Gary Thomas)	[Question 9 response] While national policy prioritises the development of brownfield sites, this inevitably brings its own issues at a local level relating to delivering and developing such sites in the required timescale. If suitable sites do not exist and are not available and/or deliverable, the key alternative is considered to be non-brownfield sites throughout the whole of the plan area. Such sites are often free from the constraints and costs associated with the issues of developing of brownfield sites and overall are likely to lead to the speedier delivery of housing (see also comments on question 4).	Support noted. The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.



ID	Full Name	Question 9 - What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing need?	Officer Response	Officer Action Points
			ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	
LPIO_500	Daphne Revell	Build more Blocks of flats - like those at Chadwell St Mary on the Brownfield sits for younger people & also build more bungalows for the older generation so that they can move from under occupied hoses into the bungalows & release their houses for family to use.	Comments noted. The Council recognises the importance of achieving the sustainable development of the Borough and ensuring that the sites allocated in the Local Plan are deliverable. The Local Plan CIL and Viability Study will inform the plan-making process and advise on the matters raised by the respondent.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_448	David Pasterfield	Look harder	noted. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

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			meeting the Boroughs future development needs.	
LPIO_104	DP World - London Gateway Via Trevor Hutchinson Planning and Transportation Ltd (Trevor Hutchinson)	Prioritise sites close to and with good access to employment opportunities.	Support noted. The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_197	EA Strategic Land Via Iceni Projects Ltd (David Churchill)	Questions 8, 9 & 10 Increasingly, the failure to maintain a housing land supply is damaging the ability of the Council to successfully lead development through a plan-led control over the delivery of housing. The High Court (ref: Solihull Metropolitan Borough Council v Gallagher Homes Ltd and Lioncourt Homes Ltd [2014] EWCA Civ 1610) has placed a scaling the weight which should be applied to inconsistent policies depending on the extent of the failure to meet the OAHN. A further Court of Appeal case (ref: Richborough Estates v Cheshire East Borough Council	Support noted. The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for

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		<p>and Secretary of State [2014] EWCA Civ 0894) has since concluded that NPPF Paragraph 49 should be interpreted widely and applies to policies which seek to restrict housing development, as well as distribute it. Ensuring suitable provision is taken during at the plan making stage to identify a housing land supply that can be maintained throughout the plan period is therefore significant. Paragraph 47 of the NPPF also requires Local Planning Authorities to ensure that the Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area. It goes on to state that it is necessary to identify and update a supply of deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 20% to allow for persistent under delivery. There have been a number of recent assessments of housing land supply undertaken within Thurrock as part of the plan-making and decision-taking processes. Whilst the details of the numbers have changed owing to the temporal nature of such assessments, the fundamental conclusions remain consistent. These conclusions are that Thurrock Council is unable to demonstrate a five-year supply of deliverable housing land in accordance with the requirements of the NPPF (in particular paragraph 47 and footnote 11); it has a record of persistent under-delivery and the application of the 20% buffer is necessary; and there is an urgent need to address the lack of deliverable sites in the Borough. The Council recognise that the under delivery of housing in the adopted Local Development Framework has resulted from a strategy which sought to prioritise development on brownfield land in the Thurrock Urban Area. Furthermore, whilst the utilisation of brownfield land for housing can provide for large quantities of housing, it often does not provide for family sized dwellings due to issues surrounding viability. There is a clear need to provide a significant amount of homes in sustainable locations on both greenfield and Green Belt land and that this will be required in order for the Plan to be found sound. As a result, the Council should consider the managed release of land in sustainable and deliverable locations. The NPPF is clear in this regard in requiring local planning authorities to identify sites which are deliverable (paragraph 47), and in order to be deliverable should be available, offer a suitable location for development and be achievable (footnote 11). Locations which do not have to rely on new employment and infrastructure opportunities being brought forward should be prioritised. West Horndon is inherently suitable to</p>	<p>and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.</p>	<p>development</p>

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		<p>deliver a range of housing for residents for the following reasons: <i>i.</i> It is well located adjacent to an existing settlement with associated services and facilities. <i>ii.</i> It is capable of providing improved local facilities for the community and will improve the local economy. <i>iii.</i> There is an existing train station that has regular services between London, Basildon and Shoeburyness. <i>iv.</i> In combination with the West Horndon site within the BBC boundary, it would be of sufficient size and scale to form a self-sustaining community where existing local services and facilities could survive, local businesses could thrive and the existing train station be used more in-line with its capacity. The site is currently vacant and available for immediate delivery.</p>		
LPIO_320	Ellandi LLP (Mark Robinson) Via Savills (Chris Moore)	<p>The NPPF states that the purpose of planning is to contribute to the achievement of sustainable development (paragraph 6). It also identifies a presumption in favour of sustainable development (paragraph 14), which in relation to plan making means that Local Planning Authorities should, through their Local Plans, positively seek opportunities to meet the development needs of their areas and meet objectively assessed needs (paragraph 14). Paragraph 49 seeks to significantly boost the supply of housing. This should be achieved partly through site allocations which provide a clear steer for development to meet the objectively assessed needs. The adopted Core Strategy identifies five regeneration areas (including Grays) in which growth will be accommodated. The strategy for Grays is to see the town modernised and regenerated as the key civic, cultural and education centre in the Borough and will include the provision of approximately 2,600 new dwellings. Ellandi support the retention of Grays as a focus for residential growth and advocate that brownfield sites within the Town Centre boundary can accommodate a proportion of the housing requirement for Thurrock. Crown House, which is within the freehold title of Grays Shopping Centre and within the Grays Town Centre boundary is an ideal location for high density residential development. At a national level, the principle of residential uses in town centres is fully recognised as an important part of the overall mix of uses which adds to the vitality and viability of centres (particularly in centres where regeneration is underway). Crown House has the potential to form a key component of the emerging Regeneration Vision for Grays. Key regeneration projects in close proximity to Crown House include the proposed north-south pedestrian underpass at Grays Train Station and a new commercial and residential</p>	<p>noted. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>

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		<p>quarter to the south of the railway (including the new college campus). A scheme for residential development at Crown House which makes use of redundant office space would align closely with these projects and would provide a catalyst for future investment in the Town Centre. Ellandi would welcome further discussion with Thurrock Council regarding this site with a view to ensuring that its aspirations for Grays Shopping Centre can be articulated within the emerging Local Plan and that the policies align with what is realistically deliverable in this location during the Plan period.</p>		
LPIO_529	Essex and Suffolk Water Via Savills (David Henry)	<p>National policy and the existing Core Strategy both encourage the effective use of land. This includes reusing existing sites particularly where they have good access to existing services and contribute effectively to meeting local needs. Within Thurrock, there is a limited supply of as yet uncommitted or undeveloped Brownfield land. The redundant Vange water treatment works would fall into this category. It is our opinion that the efficient reuse of such sites should be prioritised within the emerging new Local Plan over the release of alternative Greenfield sites in the first instance. However, it is accepted that it is likely that Greenfield land releases will also be required to meet objectively assessed need. Sites such as at Vange can be brought forward quickly and effectively early in the plan period and thus make a material contribution towards satisfying 5-year housing lands requirements. Although part of the site is in active use (in this case for open storage) an alternative use, particularly housing, would be likely to have no greater impact on its surroundings than its existing use. Accordingly, we request that you should identify sites including the former Vange Water Treatment Works as being suitable and justifiable development proposals.</p>	<p>Comments noted. The South Essex Housing Market Assessment (SHMA) will provide evidence of the need for new housing in the Borough and the types of housing required to meet the Thurrock's Objectively Assessed Housing Need (OAN) in full. The Thurrock Housing Land Availability Assessment (HLAA) will consider the planning merits of the respondents site and the outcome of this process will inform any future decisions on whether to allocate the site(s) in the Local Plan for development.</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.</p>
LPIO_212	Essex County Council (Lesley Stenhouse)	<p>The following may wish to be considered as Thurrock prepares its Local Plan vision: The need to provide excellent connectivity between residential, employment, retail and other uses that are not wholly reliant on the car. Particular consideration should be given to reducing severance caused by infrastructure to any proposed development sites and improving environmental quality. Sites for development should be underpinned by deliverable planning policies and incorporate infrastructure requirements. Specific reference to sustainable development to recognise its importance, in line with the NPPF which states that economic, social and environmental elements should be sought jointly and this includes strategies to safeguard the environment,</p>	<p>Support noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations,</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>



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		<p>mitigating and adapting to climate change and securing good design. (NPPF Paras 6-10 and 18-22) The importance of the ecology and diverse habitat within the area should be recognised, having regard to its potential contribution in redeveloping brownfield sites, green infrastructure such as Sustainable Drainage Schemes (SUDs) and the River Thames. Thurrock Council may wish to consider the inclusion of ecology within the vision, to recognise potential and contribution of ecology, priority habitats and links to brownfield sites, with high biodiversity and ecology value, as well as their contribution to Green Infrastructure such as Sustainable Drainage Systems.</p> <p>Priority habitats and species/ brownfield sites: The Plan should include specific reference to priority habitats and species. Please note that the UK Post-2010 Biodiversity Framework has replaced the UK Biodiversity Action Plan (UKBAP); and UKBAP species and habitats should now be referred to as Species of Principal Importance and Habitats of Principal Importance under section 41 of the Natural Environment and Rural Communities Act 2006. The Framework uses the simplified term: 'Priority Species or Habitats'. In relation to this, your attention is drawn to the issue of developing brownfield sites. Some of Thurrock's brownfield sites are extremely important for biodiversity. In particular, the Thames Terrace Grasslands that have developed on them, for which south Essex- including Thurrock- is particularly important. The terrace sands and gravels that overlook the Thames marshes, and stretch south from the A13, support a wide variety of invertebrate-rich terrestrial habitats. The Shril Carder Bee, Brown-banded Carder Bee, Four-banded Weevil Wasp and Fancy-legged Fly are among some of the charismatic species, which have nationally significant strongholds in south Essex. Since the middle of the 20th century, there has been a significant loss of semi-natural Thames Terrace habitat that supports these rare species, and the brownfield sites that have largely replaced their natural habitats are increasingly under threat from development. Over the last decade considerable work has been undertaken to better understand their habitat requirements, and to implement measures to re-create Thames Terrace habitat; most recently as part of the Greater Thames Marshes Nature Improvement Area (NIA). Brownfield land of high biodiversity value is classed as Open Mosaic Habitats on Previously Developed Land please see page 49 of UKBAP - Priority Habitat Descriptions Dec 201 This is a priority habitat (also referred to as a Habitats of Principal Importance) which is included in the England Biodiversity List published by the</p>		



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		Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006. Mitigation hierarchy: ECC recommend the approach to biodiversity mitigation hierarchy is consistent with the NPPF to ensure it is considered strategically at the Local Plan stage, as well as at the development management stage.		
LPIO_295	Gladman Developments Ltd (Phil Bamford)	Q9. The Council states that National Policy states that brownfield land should be prioritised. This is contrary to the advice contained in paras 17 and 111 of the Framework that seeks only to encourage the use of brownfield land not prioritise it. To prioritise the reuse of brownfield land is not supported by national policy and can lead to a reliance being placed on land for new development which is unviable to bring forward. This can lead to issues with maintaining a robust 5-year supply of housing land. Gladman therefore suggest that Thurrock undertake a full review of all site options, both greenfield and brownfield, to seek to meet its full OAN for housing. This should include a full strategic review of the Green Belt to assess whether any sites could be released from the Green Belt in order to ensure that the Councils full OAN is met. Para 83 of the Framework states that LPAs should establish their Green Belt boundaries in their Local Plans and should alter them, through a review of the Local Plan in exceptional circumstances. It is considered that with the need to address housing needs in full within Thurrock, plus the need to seek to accommodate a proportion of London's unmet needs, this could constitute the exceptional circumstances required to trigger Green Belt release. This issue should therefore be tested through the preparation of a comprehensive strategic Green Belt study.	noted. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_41	Industrial Chemicals Ltd Via Lawson Planning Partnership Ltd (Aarti O'Leary)	The availability of brownfield sites is directly linked to the financial feasibility of bringing forward previously developed land (PDL). In order for the Council to maximise the level of PDL in its housing delivery strategy, it needs to compile a realistic evidence base to support the application of significant discounts to affordable/ starter home provision and social/ physical infrastructure contributions. Accessible urban greenfield sites should also be prioritised.	noted. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

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			Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	
LPIO_4	Julian Waller	The Council should look to Green Belt sites which do not perform the functions of Green Belt owing to their location and relationship with surrounding development.	noted. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_18	Lawson Planning Partnership Ltd (Jenny Moor)	It is considered unlikely the Council will be able to find sufficient brownfield sites to meet its housing need and further suitable and sustainable greenfield sites will need to be allocated for development, resulting in the need for sites to be released from the Green Belt for housing. As previously stated, a review of the Green Belt therefore needs to be undertaken concurrent with preparation of the Local Plan to enable the release of appropriate sites from the Green Belt for development.	noted. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

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			Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	
LPIO_354	Medway Council (Catherine Smith)	Medway Council has recently undertaken a SHMA to calculate its Objectively Assessed Need and Housing Market Area. No significant links were identified with Thurrock Council area. Medway Council at the present time plans to meet its own need. It is noted that Thurrock Council is currently awaiting the results of the South Essex SHMA; Medway Council would be interested to review the findings of this to note if any links have been identified between our two boroughs. We also note the Council do not currently have a position on how they are to meet its OAN internally or externally. If this position should change and impact on Medway, then we would be grateful of undertaking discussions with Thurrock Council.	Comments noted. The production of the Local Plan is being underpinned by the preparation of a wide range of need and capacity studies consistent with the policy approach and guidance set out in the NPPF and PPG. This includes the SE SHMA, the Thurrock HLAA and the Thurrock Green Belt Assessment. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs. At this stage in the plan-making process no evidence has been submitted to the Council which supports the need for Thurrock to allocate land to meet the future development needs of any adjoining area. Should this be the case in future the Council work with neighbouring authorities to resolve this issue	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

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			through the Duty to Cooperate process.	
LPIO_335	Miller Strategic Land Via MRPP (Richard Robeson)	Thurrock's housing position remains dire. Whilst policy requires the prioritisation of brownfield sites, it is clear that housing land supply is a major constraint to the delivery of new homes. The Council needs not just a 'flexible' approach, but a revolutionary one if it is to address the very substantial under-build of the past 10 years. If the Council cannot, as seems likely, identify sufficient brownfield sites to meet demand, then it must look to countryside locations, which inevitably engages with Green Belt policy. Unlike past decisions, it is now imperative that the Council undertakes a broad, top-down, sustainability-driven review in order to identify the most suitable locations to release land from the Green Belt for development.	noted. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development
LPIO_386	Natural England (Jamie Melvin)	The Council will be aware that many brownfield sites in the district hold elevated biodiversity and nature conservation interest, and should be regarded as being of high environmental value (NPPF paragraph 11 In addition to references provided under question 4, the Council is also referred to the DEFRA NERC Act section 41open mosaic habitat inventory (NB this site is temporarily closed, at the time of writing). The Council should ensure that the existing environmental value of brownfield sites is factored into any allocations. Please note that habitat inventories are not exhaustive, and so an appropriate level of information should be sought to inform any such allocation. When proposing the development of greenfield sites, appropriate weight should be given to the roles performed by the areas soils. These should be valued as a finite multi-functional resource which underpin 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	Comments noted. The Local Plan will have a key role to play in providing an appropriate planning policy framework to safeguard and enhance the Boroughs built, natural and historic environment. The Council has commissioned an update of the evidence base to ensure that the Local Plan achieves the objectives through the proper identification of Thurrock's built, natural and historic assets and the management issues associated with each designation and site.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

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		<p>Agricultural Land Classification) as a resource for the future. To assist in understanding agricultural land quality within the plan area and to safeguard best and most versatile agricultural land in line with paragraph 112 of the National Planning Policy Framework (NPPF), strategic scale Agricultural Land Classification (ALC) Maps are available. Natural England also has an archive of more detailed ALC surveys for selected locations. Both these types of data can be supplied digitally free of charge by contacting Natural England. Some of this data is also available on the www.magic.gov.uk website. The planning authority should ensure that sufficient site specific ALC survey data is available to inform plan making. New ALC surveys may be required for sites allocated in the plan.</p>		
LPIO_137	Persimmon Homes Essex (Anna Davies)	<p>Paragraph 17 of the NPPF encourages the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value. Persimmon Homes supports the redevelopment of brownfield sites in meeting housing needs where they are deliverable. However, the Council must be cautious about relying on brownfield sites to meet their housing needs, particularly in the early plan of the plan period. Brownfield land, particularly land previously used for industrial purposes, can often be rendered unviable due to high remediation costs or more difficult to delivery quickly due to issues such as site assembly. As detailed above, the Council will need to undertake a Green Belt Review. In addition to housing allocations to meet OAN, it is suggested that the Council should also allocate reserved sites within the Local Plan, to ensure that the Council can meet its housing needs in the event that site delivery is delayed or the Council cannot demonstrate a 5-year land supply of deliverable sites.</p>	<p>noted. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>
LPIO_274	Quod	<p>The Council is in the process of updating the Strategic Housing Land Availability Assessment but the most recent information comes from the Councils Annual Monitoring Report 2014 which reports that the Council is averaging 485 units per annum borough wide which is well below the 950 units per annum to meet the Local Development Framework target. This shortfall has resulted in a need for an annual build rate of 1,412 units per annum from 2015 to 2026, with a current estimated five-year requirement of 843 dwellings per annum. As the level of building</p>	<p>noted. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for</p>



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		<p>decreased significantly during the recession the residual requirement has increased and this five-year supply now represents just 50% of the Boroughs requirement (or a 5-year supply). All local planning authorities in England are required to have a minimum five-year supply of housing land. It can be concluded from this information that the Council is not meeting its 5-year housing land requirement and further sites need to be identified in order to meet housing need. Paragraph 49 of the NPPF requires all decision makers who are determining planning applications and appeals to treat "relevant policies for the supply of housing as not up to date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites. "The recent judgement at the Court of Appeal in March 2016 (Suffolk Coastal DC v Hopkins Homes &amp; SSCLG and Richborough Estates v Cheshire East BC &amp; SSCLG [2016] EWCA Civ 168) is very relevant. On six occasions previously, the High Court had tried to decide upon the meaning of the phrase "relevant policies for the supply of housing", with contradictory conclusions. The Richborough case brought an appeal against one of those High Court Judgments in a hearing which took place in January 2016. In summary the judgement confirmed that paragraph 49 of the NPPF is about the delivery of housing. The judgement also confirms that local planning authorities are not able to use environmental policies, including Green Belt policies, to restrict housing development when they cannot themselves demonstrate the minimum five-year supply of housing. This is very relevant to Thurrock and given the acute shortage of housing in Thurrock and the absence of a five-year housing land supply, a Green Belt Review which allows the release of Green Belt land for housing is critical. Indeed, Policy CSSP1 of the Core Strategy states that development will only be permitted on Greenfield and Green Belt land where it is specifically allocated for residential development and where it is required to maintain a five-year rolling housing land supply. CSSP1 also states that new housing development will be considered in the Green Belt, where appropriate. The wording of Policy CSSP1 indicates that there is a will to release Thurrock's Green Belt land if it is necessary to provide sites for much needed housing. It is clear that Greenfield and Green Belt land is required to ensure that sufficient housing sites are identified for the next 15 years and beyond the life of the Local Plan, post 2035. A review of the Thurrock's Green Belt is therefore long overdue and form part of the evidence base for the emerging Local Plan.</p>	<p>that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.</p>	<p>development.</p>



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LPIO_88	Rochford District Council (Natalie Hayward)	Rochford District Council has no specific observations to make, but would like to emphasise the importance of robust and up to date evidence to support the preparation of Thurrock's new Local Plan.	Support noted. The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_261	S & J Padfield & Partners Via Strutt and Parker LLP (James Firth)	Seeking to locate development in locations that have good access to existing services is supported. It is acknowledged that there will also be a need to consider development of brownfield sites in line with national planning policy, however, as set out in relation to our comments on question 1 reliance on brownfield sites alone is considered unlikely to meet required housing needs. Existing identified brownfield sites have not come forward for development in order to maintain sufficient housing land supply and fully meet needs. It is therefore clear that there remains a need to consider Green Belt sites in order to meet housing and employment needs	Support noted. The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

ID	Full Name	Question 9 - What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing need?	Officer Response	Officer Action Points
		over the plan period.	the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	
LPIO_191	South Essex College Via Carter Jonas (Jennifer Islip)	In order for the Local Plan to be considered sound by a Planning Inspector at the Local Plan Examination, Thurrock Council will need to ensure its Local Plan meets all requirements as set in the NPPF. One such requirement includes the requirement for a Local Plan to meet its objectively assessed need to provide market and affordable housing. Should there not be enough suitable and viable brownfield sites to meet this need then Thurrock Council will need to assess other land in the district that has the potential to deliver housing. As the majority of land outside the urban areas is covered by Green Belt designation (70%), the College suggests that Thurrock Council commission a Green Belt Review. The Green Belt Review should apply the Green Belt tests as set out in Paragraph 80 of the NPPF to assess and rank potential sites in terms of their Green Belt function. Once the study is complete Thurrock should then allow selective release of those sites that are in a sustainable location and perform a lesser Green Belt function in comparison to others. The extent of Green Belt release would be dependent on the housing numbers that Thurrock Council is required to meet. The College own land west of Love Lane, Aveley, that could be suitable for Green Belt release to assist Thurrock Council with meeting the housing needs	noted. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

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		of residents in Aveley and the surrounding rural area. The benefits of the site for housing are described in more detail below		
LPIO_427	South Ockendon Centre (Wendy Curtis)	Revisit the Green Belt area.	noted. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development
LPIO_242	Starcourt Developments Ltd (Brian Cooke) Via Barton Willmore (Justine Bailey)	As stated above in our response to Question 3, the 2014 AMR confirms that Thurrock only has a 5 years supply of housing and therefore is tasked with meeting increased targets of 8,472 over the 5-year period which includes a 20% buffer. This equates to an annual rate of 1,694 which is over and above the 488 units identified in the SHLAA pool of deliverable sites for the year 2014/15. The Council are correct to seek further development opportunity areas if it cannot find sufficient, suitable brownfield sites. It is recognised by national policy within the NPPF that the development of brownfield sites should be encouraged, however, the NPPF also states that Local Authorities should identify and update annually a supply of deliverable sites to provide five years' worth of housing against their housing requirements. Given the finite nature of brownfield availability, the abnormal development and land assembly costs frequently associated with the delivery of brownfield sites, as well as other potential physical constraints of sites in Purfleet, including high exposure to flooding, other options also have to be fully explored. It will therefore be prudent for the Council to not	noted. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

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		<p>overly rely upon brownfield sites alone in order to meet targeted housing need. Given that the Metropolitan Green Belt covers a very large portion of the Borough, it is highly likely that sustainable sites will emerge within Green Belt areas adjacent to the urban fringe, such as our Clients land at Mar Dyke, which will have to be considered when identifying additional sites in order to fully meet objectively assessed need.</p>	<p>appropriate spatial options for meeting the Boroughs future development needs</p>	
LPIO_364	Strutt & Parker LLP (Richard Clews)	<p>The supporting text for Question 9 recognises the very issues set out above regarding housing delivery in the previous Local Plan. The reliance on complex urban sites has unfortunately failed to deliver the housing and employment land requirements within the Borough over the previous decade. This submission expresses our considered view that it is unlikely the Council will be able to identify a deliverable and consistent supply of homes to meet the annual requirement solely through suitable brownfield sites. There has been a demonstrable and persistent under delivery of homes within Thurrock following this approach. The Council should therefore strongly consider a strategy that involves the release of greenfield sites to help meet housing need throughout the plan period. In seeking to meet the annual need for homes and employment land, the Council should focus on simultaneously releasing greenfield sites with urban sites. The Council should focus on those that are located around existing settlements with good infrastructure, access to jobs and services. Greenfield sites are able to provide viable development that deliver consistent numbers of new homes and new infrastructure. Such sites should be supported by the Plan in order to deliver sustainable development.</p>	<p>noted. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>
LPIO_542	Taylor Wimpey East London Via Barton Willmore (Lauren Dooley)	<p>The Council will need to look to allocate Green Belt land for housing to be able to meet its housing needs. There simply is not sufficient brownfield land within Thurrock to accommodate required growth. To ensure protection of the highest quality Green Belt land in Thurrock, the Council should carry out a Green Belt review. Land in less sensitive locations and situated adjacent or close to the five main growth areas should be considered for release in the first instance.</p>	<p>noted. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>

ID	Full Name	Question 9 - What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing need?	Officer Response	Officer Action Points
			Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	
LPIO_551	The Billings Group Via DHA (David Bedford)	Question 9 states that national policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing. However, this statement is misleading, incorrect and provides a biased starting point for a public consultation. Paragraph 17 of the National Planning Policy Framework (NPPF) encourages the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value. It is the environmental value that is the key test and the reference to redundant sites introduces a restriction that is not supported by the NPPF. To the contrary, paragraph 51 of the NPPF explicitly states that local planning authorities should normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate. Accordingly, there is national planning policy support for the reclassification of land such as that in our Clients control at Sandy Lane, Chadwell St Mary for housing, which is not reflected by the current consultation document.	Comments noted. The South Essex Housing Market Assessment (SHMA) will provide evidence of the need for new housing in the Borough and the types of housing required to meet the Thurrock's Objectively Assessed Housing Need (OAN) in full. The Thurrock Housing Land Availability Assessment (HLAA) will consider the planning merits of the respondents site and the outcome of this process will inform any future decisions on whether to allocate the site(s) in the Local Plan for development.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_454	Vivian Humphry	This cannot possibly be an issue! there are brownfield sites enough to spare! the only reason they don't get used is because they cost developers too much and therefore eat into their profits. they only want easy money.	Support noted. The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

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			Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	

#### Responses to Question 10

Comment ID	Consultee Details	Response to question 10 - What types of housing do you think will be most needed in the Borough over the coming years?	Officer Response	Officer Action Points
LPIO_19	Lawson Planning Partnership Ltd (Jenny Moor)	A mix of housing will need to be provided in the Borough to meet local needs and this specific mix will be identified in the Strategic Housing Market Assessment currently being undertaken by the Council as part of the evidence base to the emerging Local Plan. It will also be important for sites to deliver affordable housing and it is identified in the Sustainability Appraisal Scoping Report that increased provision of affordable housing is required to meet local needs. It is considered that a range of types and tenures of affordable housing should be provided (subject to financial viability testing) to meet all needs. Our clients site will be able to provide a high quality development offering a wide choice of homes that will assist in meeting these local needs.	Comments noted. The South Essex Housing Market Assessment (SHMA) will provide evidence of the need for new housing in the Borough and the types of housing required to meet the Thurrock's Objectively Assessed Housing Need (OAN) in full. The Thurrock Housing Land Availability Assessment (HLAA) will consider the planning merits of the respondents site and the outcome of this process will inform any future decisions on whether to allocate the site(s) in the Local Plan for development.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_42	Industrial Chemicals Ltd	A mix of housing types, having regard to the updated Strategic Housing Market Assessment ought to be	Support noted. The Council has or is in the process of	The Council will arrange a meeting with the respondent



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	Via Lawson Planning Partnership Ltd (Aarti O'Leary)	provided. A significant need for Starter Homes (as defined in the Governments Draft Housing and Planning Bill) is also evident and this need is potentially greater than that for affordable housing, as the majority of economically active residents under 40 years of age are faced with financial constraints in accessing the housing market.	commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations.	to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_105	DP World - London Gateway Via Trevor Hutchinson Planning and Transportation Ltd (Trevor Hutchinson)	Low cost, predominantly flats/apartments with a proportion of affordable family housing.	Support noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_121	Port of London Authority (Helena Payne)	New Homes The need for new homes is a key topic within the consultation documents. Whilst not specifically relevant to the interests of the PLA, I wish to take the opportunity in advising that should any riverside sites come up for mixed use or residential development, policy should consider the need to maximise the use of the river for the transport of materials associated with riverside development, and the removal of waste. In addition, on completion of future development, the use of the river as an alternative, and sustainable, form of passenger transport.	Support noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_138	Persimmon Homes Essex (Anna Davies)	Whilst the Councils evidence base, including the emerging Strategic Housing Market Assessment, provides a base for determining an appropriate mix that should be met through development, the Council needs to adopt a flexible approach. A sites location and phasing within the Local Plan may require a mix of housing that is not reflected through the Councils evidence base but has been identified through public consultation and changes in demand for housing. This should be given some weight in determining an appropriate mix.	Comments noted. The South Essex Housing Market Assessment (SHMA) will provide evidence of the need for new housing in the Borough and the types of housing required to meet the Thurrock's Objectively Assessed Housing Need (OAN) in full. The Thurrock Housing Land Availability Assessment (HLAA) will consider the planning merits of the respondents site and the outcome of this process will inform any future decisions on whether to allocate the site(s) in the Local Plan for development.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_204	EA Strategic	Questions 8, 9 & 10 Increasingly, the failure to maintain a	Support noted. The Council	The Council will arrange a

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	Land Via Icen Projects Ltd (David Churchill)	<p>housing land supply is damaging the ability of the Council to successfully lead development through a plan-led control over the delivery of housing. The High Court (ref: Solihull Metropolitan Borough Council v Gallagher Homes Ltd and Lioncourt Homes Ltd [2014] EWCA Civ 1610) has placed a scaling the weight which should be applied to inconsistent policies depending on the extent of the failure to meet the OAHN. A further Court of Appeal case (ref: Richborough Estates v Cheshire East Borough Council and Secretary of State [2014] EWCA 6 Civ 0894) has since concluded that NPPF Paragraph 49 should be interpreted widely and applies to policies which seek to restrict housing development, as well as distribute it. Ensuring suitable provision is taken during at the plan making stage to identify a housing land supply that can be maintained throughout the plan period is therefore significant. Paragraph 47 of the NPPF also requires Local Planning Authorities to ensure that the Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area. It goes on to state that it is necessary to identify and update a supply of deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 20% to allow for persistent under delivery. There have been a number of recent assessments of housing land supply undertaken within Thurrock as part of the plan-making and decision-taking processes. Whilst the details of the numbers have changed owing to the temporal nature of such assessments, the fundamental conclusions remain consistent. These conclusions are that Thurrock Council is unable to demonstrate a five-year supply of deliverable housing land in accordance with the requirements of the NPPF (in particular paragraph 47 and footnote 11); it has a record of persistent under-delivery and the application of the 20% buffer is necessary; and there is an urgent need to address the lack of deliverable sites in the Borough. The Council recognise that the under delivery of housing in the adopted Local Development Framework has resulted from a strategy which sought to prioritise development on brownfield land in the Thurrock Urban Area. Furthermore, whilst the utilisation of brownfield land for housing can provide for large quantities of housing, it often does not provide for family sized dwellings due to issues surrounding viability. There is a clear need to provide a significant amount of homes in sustainable locations on both greenfield and Green Belt land and that this will be required in order for the Plan to be found sound. As a result, the Council should consider the</p>	<p>recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.</p>	<p>meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>

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		<p>managed release of land in sustainable and deliverable locations. The NPPF is clear in this regard in requiring local planning authorities to identify sites which are deliverable (paragraph 47), and in order to be deliverable should be available, offer a suitable location for development and be achievable (footnote 11). Locations which do not have to rely on new employment and infrastructure opportunities being brought forward should be prioritised. West Horndon is inherently suitable to deliver a range of housing for residents for the following reasons: i. It is well located adjacent to an existing settlement with associated services and facilities. ii. It is capable of providing improved local facilities for the community and will improve the local economy. iii. There is an existing train station that has regular services between London, Basildon and Shoeburyness. iv. In combination with the West Horndon site within the BBC boundary, it would be of sufficient size and scale to form a self-sustaining community where existing local services and facilities could survive, local businesses could thrive and the existing train station be used more in-line with its capacity. The site is currently vacant and available for immediate delivery.</p>		
LPIO_213	Essex County Council (Lesley Stenhouse)	<p>Thurrock Council may wish to seek to ensure that all new developments: Contributes to the sustainable vision, where it is easy for all to make the transition to a lifestyle that results in lower carbon emissions; whilst mitigating and adapting to climate change. By building to the highest quality standard, both in terms of its design and any impact upon its surroundings; having a neutral impact on water, contribute to an overall flood risk reduction and to protect and enhance green open spaces. To promote and support economic growth in environmentally sustainable and accessible locations; To promote sustainable travel to encourage walking and cycling as the first choices of travel; With the removal of Code for Sustainable Homes, this gives the Council the opportunity to set their own locally determined standards for Low carbon in excess of the Building Regulations and awareness Resilience in low flood risk areas/flood attenuation, water efficient, insulated against overheating. Consideration may be given to preparing supplementary planning guidance on how to meet the energy efficiency and renewable energy standards as set out in the Local Plan or as a mechanism to improve the energy efficiency of existing homes. There may be potential for this to be explored within the emerging Thurrock Design Strategy. The guidance / strategy could take into consideration the following: Mitigating climate change by reducing emissions:</p>	<p>Support noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations.</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>

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		<p>Reducing the need to travel and providing for sustainable transport; Ensuring that the transport network is developed to minimise car use is another key factor in cutting carbon (and cutting expenditure on fuel). This includes ensuring provision for cycling (bike lanes, parking) limiting car parking spaces and ensuring new developments have good public transport links; Providing opportunities for renewable and low energy technologies; Developments to meet the standards within the new building regulations or local standards; To use best practice energy efficiency and sustainable construction methods, including waste management, should be incorporated in all aspects of development, with use of locally sourced and recycled materials where possible, and designed to high energy and water efficiency standards. Adapting to a changing climate: Considering future climate risks when allocating development sites to ensure risks are understood over the developments lifetime; Considering the impact of and promoting design responses to flood risk for the lifetime of the development; Development should be directed to locations with the least impact on flooding or water resources. Where development is proposed in flood risk areas, mitigation measures must be put in place to reduce the effects of flood water; All development should aim to limit surface water run-off by attenuation within the site as a means to reduce overall flood risk and protect the quality of the receiving watercourse by giving priority to the use of sustainable drainage in developments; Considering availability of water and water infrastructure for the lifetime of the development and design responses to promote water efficiency and protect water quality; Promoting adaptation (and mitigation) approaches in design policies for developments and the public realm; Green infrastructure to be used as a way of adapting and mitigating for climate change through the management and enhancement of existing habitats and the creation of new ones to assist with species migration, to provide shade during higher temperatures and for flood mitigation i.e. Providing a permeable surface and allowing places to store water for reuse, Providing water storage and retention areas to alleviate flooding. Development will be planned to minimise the vulnerability to climate change impacts and that such development will not exacerbate vulnerability in other areas. ECC acknowledge that these issues are applicable to the Climate Change section; however, consider this equally applies when considering housing types and design.</p>		
LPIO_290	Gladman	Q10. Thurrock will require a wide range of housing units	Support noted. The Council	The Council will arrange a

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	Developments Ltd (Phil Bamford)	<p>over the next plan period including smaller units for starter homes, family units to attract new families to the area and ensure that the Council can maintain a prosperous labour market and specialist accommodation for the elderly. A copy of a Strategic Housing for Older People report produced in April 2016 is included as Appendix 1 to this representation which sets out the level of need for older person's accommodation. The process of undertaking an OAN is clearly set out in the Framework principally in 14, 47, 152 and 159 and should be undertaken in a systematic and transparent way to ensure that the plan is based on a robust evidence base. 5.2 The starting point for this assessment requires local planning authorities to have a clear understanding of housing needs in their area. This involves the preparation of a Strategic Housing Market Assessment (SHMA) working with neighbouring authorities where housing market areas cross administrative areas as detailed in 159 of the Framework. The Framework goes on to set out the factors that should be included in a SHMA including identifying the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which: Meets household and population projections taking account of migration and demographic change; Addresses the need for all types of housing including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and Caters for housing demand and the scale of housing supply necessary to meet this demand. 5.3 Key points that are worth noting from the above is that the objective assessment should identify the full need for housing before the Council consider undertaking any process of assessing the ability to deliver this figure. In addition, 159 specifically relates to catering for both housing need and housing demand within the authority area. It is worth pointing out that any assessment of housing need and demand within a SHMA must also consider the following factors; falling household formation rates, net inward migration, the need to address the under provision of housing from the previous local plan period, the results of the Census 2011, housing vacancy rates including the need to factor in a housing vacancy rate for churn in the housing market, economic factors to ensure that the economic forecasts for an area are supported by sufficient housing to deliver economic growth, off-setting a falling working age population by providing enough housing to ensure retiring workers can be replaced by incoming</p>	has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations	meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.



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		<p>residents, addressing affordability and delivering the full need for affordable housing in an area. 5.4 Of particular importance is the need to consider market signals. The consideration of market signals is one of the core planning principles considered in 17 of the Framework, which states: Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities. 5.5 Of critical importance is what the Framework goes onto say in 158 in the section discussing Plan Making. It states here: Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals. 5.6 Market signals are therefore at the very core of what the Framework is trying to achieve in promoting sustainable development and boosting the supply of housing land. 5.7 The formal publication of the Planning Practice Guidance in March 2014 gives further explanation to what the Framework means with regard to market signals, and sets out, in a range of paragraphs, the way in which local planning authorities should go about factoring in relevant market signals in arriving at their OAN. 19 and 20 of the PPG gives guidance on what market signals should be taken into account and how plan makers should respond to these market signals. The below extracts identify some particularly pertinent points. The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. Prices of rents rising faster than the national/local average may well indicate particular market undersupply relative to demand. 5.8 The paragraph goes on to indicate that these factors would include, but should not be limited to, land prices, house prices, rents, affordability, rates of development and overcrowding. However, given what the Framework says at 17, quoted above, it seems clear that particular consideration should be given to affordability. 5.9 In order to consider how market signals should be taken forward 20 identifies some key concepts: Appropriate comparisons of indicators should be made. This includes comparison with longer term trends (both in absolute levels and rates of change) in the: housing market area; similar demographic and economic areas; and nationally. A worsening trend in any of these indicators will require upward adjustment to</p>		



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		<p>planned housing numbers compared to ones based solely on household projections. 5.10 It is therefore clear that where market signals are apparent (in any of the indicators assessed) there is an absolute and clear direction that an upward adjustment to housing numbers is required. It is also clear that both the absolute level of change and the rates of change are considerations, and that local planning authorities need to carefully benchmark themselves against other areas. This should not simply be a case of considering neighbouring authorities but should look at, as well as these, local authorities on a national basis, if the demographic and economic indicators are relevant. Gladman are firmly of the view that considering comparisons purely against neighbouring authorities is not sufficiently robust and does not address the underlying issues which both the Framework and PPG are trying to tackle with regard to housing. 5.11 What is of further importance when considering these issues is the period of time analysed when considering both relative and absolute change. It has become apparent, in our consideration of a number of plans that many local authorities choose to look at periods of time which are not fully representative of the depth of the housing crisis which we are currently within. 5.12 The problems are noted in Fixing the Foundations: Creating a more prosperous nation published by HM Treasury in July 2015. In paragraph 9.7 the report states: There remains more to do. As the London School of Economics (LSE) Growth Commission found, under supply of housing, especially in high-growth areas of the country has pushed up house prices. The UK has been incapable of building enough homes to keep up with growing demand. 5.13 Gladman are therefore of the view that local planning authorities must take a long term view when considering affordability and consider the relative and absolute change over a long term 15-20-year period, which coincides with the normal time span of a Local Plan. Authorities should assess, as a constituent part of their OAN, how they can improve affordability over the life time of a plan to a point where affordability is more in line with average earnings and affordable mortgage lending rates. They should assess a level of housing over the 15-20-year plan period which would enable this step change and consider its deliverability in the plan. Only through planning for significant housing growth can local authorities realistically tackle market signals in the way advocated by the PPG and tackle the affordability and housing crisis. 5.14 The need to identify the full OAN before considering any issues with the ability of a Local Planning Authority to</p>		

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		<p>accommodate that level of development has been confirmed in the High Court. Most notably in Solihull Metropolitan Borough Council v (1) Gallagher Homes Limited (2) Lioncourt Homes Limited where it was considered that arriving at a housing requirement was a two stage process and that first the unconstrained OAN must be arrived at. In the judgement it was stated: The NPPF indeed effected a radical change. It consisted in the two-step approach which paragraph 47 enjoined. The previous policy's methodology was essentially the striking of a balance. By contrast paragraph 47 required the OAN [objectively assessed need] to be made first, and to be given effect in the Local Plan save only to the extent that that would be inconsistent with other NPPF policies. [;]</p> <p>The two-step approach is by no means barren or technical. It means that housing need is clearly and cleanly ascertained. And as the judge said at paragraph 94, [h]ere, numbers matter; because the larger the need, the more pressure will or might be applied to [impinge] on other inconsistent policies. 5.15 Therefore following the exercise to identify the full, OAN for housing in an area, Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate. (NPPF 152) 5.16 This statement clearly sets out that local planning authorities should seek to deliver the full OAN and that this should be tested through the evidence base. Only where the evidence shows that this is not achievable should they then test other options to see if any significant adverse impacts could be reduced or eliminated by pursuing these options. If this is not possible then they should test if the significant adverse impacts could be mitigated and where this is not possible, where compensatory measures may be appropriate. 5.17 The final stage of the process is outlined in 14 and involves a planning judgement as to whether, following all of the stages of the process outlined above, Local Plans should meet OAN, with sufficient flexibility to adapt to rapid change, unless: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or specific policies in this Framework</p>		

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		<p>indicate development should be restricted. 5.18 It is also worth noting that the final part of this sentence refers to footnote 9 of the Framework which sets out the types of policies that the Government consider to be restrictive. These include: sites protected under the Birds and Habitat Directive (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion. 5.19 Although this list is not exhaustive it is clear that local landscape designations, intrinsic value of the countryside, the character of areas, green gaps etc. are not specifically mentioned as constraints by the Framework. 5.20 The National Planning Practice Guidance (NPPG) contains guidance to support local authorities in objectively assessing and evidencing development needs for housing (both market and affordable) and economic development. This document supports and provides further guidance on the process of undertaking such assessments, in addition to what is set out in the Framework.</p>		
LPIO_321	Ellandi LLP (Mark Robinson) Via Savills (Chris Moore)	The Councils emphasis should be placed on ensuring that there are enough homes delivered in Thurrock to meet objectively assessed need. Given the likelihood of such need increasing significantly in the future the Council should be looking into the potential to redevelop alternative sites, outside of those broad locations for residential development, namely Grays Town Centre, where redevelopment of sites to deliver high quality and high density apartments would constitute sustainable development. The mix of housing for Grays Town Centre and wider borough should be informed by an update to the South Essex Strategic Housing Market Area (as cited at paragraph 11 of the consultation document).	Support noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_543	Taylor Wimpey East London Via Barton Willmore (Lauren Dooley)	We would suggest that future planned housing mix is informed and determined by the latest Strategic Housing Market Assessment. This should be regularly updated throughout the Plan period and policy flexible to respond to the changing needs of the Borough.	Support noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development
LPIO_501	Daphne Revell	I think the Council needs to build mostly Council houses which can be provided at a reasonable rent, & the Council	Support noted. The Council has or is in the process of	The Council will arrange a meeting with the respondent

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		houses MUST stay in council ownership at all times & not be allowed to be purchased by the Right - to -buy scheme. then there will always be housing available at a reasonable rent for those who cannot afford, or do not want to buy a house.	commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations.	to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development
LPIO_455	Vivian Humphry	Affordable homes- but in my opinion there are far too many flats. Young families need proper houses.	Support noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development
LPIO_534	George Watts	Family homes of houses or flats of two or three bedrooms with community defensible space and / or gardens. No more flats without adequate car parking for residents and visitors. Develop areas to make existing estates more self-sustaining e.g. area between Purfleet and Aveley and Tilbury and Chadwell even if that involves small incursions into the green belt. Allow development around every small town/village that increases its size by no more than 15% All developments to be of a very high standard of design and the materials used similar to those of existing buildings. Affordability being judged on the local economy rather than the general market.	Support noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development
LPIO_474	Mr Anthony Newell	The High Cost of house purchase is prohibiting most young people from entering the property market. We therefore need to greatly increase social housing (Council housing) building and affordable housing. I would like to see the council have its own work force and build its own council houses.	Support noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development
LPIO_336	Miller Strategic Land Via MRPP (Richard Robeson)	The Council must respond to the OAN for both market and affordable housing types by establishing policies which accord with Paragraphs 47, 157 and 159 of the NPPF. The Council must also acknowledge and encourage new forms of housing (e.g. PRS and Starter Homes) as	Support noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the

<b>Comment ID</b>	<b>Consultee Details</b>	<b>Response to question 10 - What types of housing do you think will be most needed in the Borough over the coming years?</b>	<b>Officer Response</b>	<b>Officer Action Points</b>
		necessary.	that the Local Plan adequately addresses the matters raised in their representations.	development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_530	Essex and Suffolk Water Via Savills (David Henry)	National policy and existing local policy encourage Local Plans to plan positively for a mix of housing based on the careful assessment of the needs of the local population both now and in the future. In general, this is likely to mean that the Local Plan should provide for a wide range of housing types and locations. This should include new housing in locations that are likely to appeal to those wishing to live as part of a rural or semi-rural community where this is consistent with the existing development pattern. The allocation of such sites would complement more urban, central alternatives whilst still satisfying the aims of sustainability. The delivery of such sites through care and design can be highly sympathetic to their surroundings and bolster vitality and viability of existing communities without leading to unrestricted urban sprawl.	noted. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development
LPIO_415	Greater London Authority (Jorn Peters)	The Mayor welcomes the Councils commitment to meet its housing need. This will have to be considered in more detail once the final version of the South Essex Strategic Housing Market Assessment has been published. The Mayor is particularly concerned that the use of CLGs household projections, which are not based on longer-term (10-year) migration trends, and may not take account of potentially higher pre-recession migration levels out of London, which may again be experienced in the future.	Support noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_428	South Ockendon Centre (Wendy Curtis)	Family Homes. Sheltered complexes.	Support noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin

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			their representations.	the preparation of a sound and deliverable local plan.
LPIO_432	South Ockendon Centre (Wendy Curtis)	No	Comments noted.	No further action.
LPIO_552	The Billings Group Via DHA (David Bedford)	We consider a suitable mix of housing is needed to reflect all the needs of the population, including for the elderly, young people, families and those with specialist needs. Our clients land at Sandy lane has the characteristics to accommodate and provide for a range of development types and tenures. In respect of affordable housing, we consider it appropriate to publish a starting point threshold for affordable housing negotiations. However, any future policy should be robust enough to respond to any change in circumstances and to take account of the viability implications of the Community Infrastructure Levy (CIL).	Comments noted. The South Essex Housing Market Assessment (SHMA) will provide evidence of the need for new housing in the Borough and the types of housing required to meet the Thurrock's Objectively Assessed Housing Need (OAN) in full. The Thurrock Housing Land Availability Assessment (HLAA) will consider the planning merits of the respondents site and the outcome of this process will inform any future decisions on whether to allocate the site(s) in the Local Plan for development.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.



**Response to Question 11**

<b>Comment ID</b>	<b>Consultee Details</b>	<b>Response to question 11 - Should the Council explore the potential for variable affordable housing targets and approaches so that difficult higher risk sites can be developed?</b>	<b>Officer Response</b>	<b>Officer Action Points</b>
LPIO_267	Arena Leisure Enterprises Ltd (Lesley Wootten) Via GL Hearn (David Maxwell)	Thurrock Council should explore the potential to vary affordable housing targets and approaches to reflect site specific circumstances. The mix and value of land uses brought forward through new residential developments can vary considerably. Specifically, some developments contribute significantly through other community and sustainability measures e.g. creation of publicly accessible open space and recreation areas/ country park. In accordance with national planning policy, development proposals should be supported by a viability appraisal such that the level of affordable housing provided within each development is appropriate and not making a development unviable and undeliverable.	Comments noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_367	County and Suburban Properties Via Planning Works Ltd (Gary Thomas)	Testing the viability of housing sites and their ability to contribute to the provision of affordable housing, in line with policy requirements, is a well-established part of planning application submissions and the existing development management process. The setting of variable affordable housing targets in policy (aside from determining what an appropriate policy level may be) does not, therefore, automatically aid delivery since viability testing (at whatever policy target level) is already undertaken as part of the development process in bringing sites to the market.	Comments noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_502	Daphne Revell	The Council must use all its excessive powers at all times to make 100% use of all suitable sites and ensure the Government provides funding if there are difficulties to make the site clearance issues financially viable.	Comments noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_322	Ellandi LLP (Mark Robinson) Via Savills (Chris Moore)	The NPPF states that pursuing sustainable development requires careful attention to viability and costs in plan-making and that plans should be deliverable (paragraph 173). It goes on to state that because of this, sites and the scale of development identified in the plan should not be subject to so many policy burdens that their ability to be developed viably is threatened. Therefore, when prescribing requirements for residential sites it is important that they are justified to take account of viability.	Comments noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of

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				individual sites for development.
LPIO_531	Essex and Suffolk Water Via Savills (David Henry)	Many sites, including previously developed land, face challenges in meeting viability requirements. Regeneration costs can readily outweigh returns and thus frustrate the delivery of the development requirement required to meet local needs. Thus some land uses may need to be set aside in favour of more beneficial ones if the positive impetus for delivering sustainable development is to be continued. Otherwise, suitable land could readily sit vacant and unused unnecessarily. An example of this can be found at the former Vange Water Treatment Works where development appraisals has established that employment land uses will not generate sufficient values to allow regeneration of this site to take place. Consequently, given its nature and surrounding, residential redevelopment is to be preferred. It also needs to be acknowledged that the costs of regeneration include meeting such measures as Community Infrastructure levy as a priority over any planning obligation. In consequence, a careful balance needs to be struck between delivering development at a viable level and seeking to satisfy other priorities, such as provision of affordable housing. Therefore, we would support the exploration of the potential for variable affordable housing targets and alternative approaches towards viability such that growth can be delivered promptly and effectively rather than having available land lying dormant.	Comments noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development
LPIO_214	Essex County Council (Lesley Stenhouse)	ECC is equally seeking to address this matter within the two tier area of the County and is working with Essex borough/district and city councils to consider and explore alternative funding sources and potential investment by local authorities in developments, as well as seeking to promote public sector land. The alternative approaches for local authorities to aid viability and deliver development concern de-risking sites, by undertaking up front work (e.g. habitat surveys) and or forward funding of enabling infrastructure are a couple examples. This is could be explored further under the duty to co-operate.	Comments noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_296	Gladman Developments (Phil Bamford)	The Council should explore variable affordable housing targets through the preparation of the Local Plan to ensure that this provision does not prevent sustainable sites from coming forward for viability reasons. The Council should therefore undertake a full plan viability assessment to ensure that development is not subject to such a scale of obligations and policy burdens that the	Comments noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin

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		delivery of the Local Plan is threatened. This viability assessment should consider the implications of changes in Government Policy on the provision of affordable housing including reductions in social rents and reductions in social housing transfer values.	their representations.	the preparation of a sound plan and the allocation of individual sites for development.
LPIO_43	Industrial Chemicals Ltd Via Lawson Planning Partnership Ltd (Aarti O'Leary)	The current level of affordable housing (35%) is considered to be too high and is acting as a brake on accessible urban land coming forward. The 70% social rented: 30% intermediate tenure split is also considered to be inappropriate and is reinforcing the very low level of housing completions evidenced since 200 The way to increase the level of housing (including affordable housing) completions over the coming 5 to 15-year period, is to significantly reduce the affordable housing % target and reduce the % split of social rented tenures to improve the financial feasibility (and viability) of bringing land forward for housing purposes. Facilitating the delivery of an increased number of sites/ units will increase the overall completion level of both market and affordable units, boosting the Councils respective housing trajectories. In addition, discounts should be applied to the level of affordable housing sought on constrained brownfield sites, to help bring land forward for redevelopment for housing purposes.	Comments noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_20	Lawson Planning Partnership Ltd (Jenny Moor)	It is not entirely clear what is meant by a higher risk site. Therefore, in this context we have assumed the term refers to sites with significant development constraints which may impact on viability considerations. There is an evident need for more housing in the Borough and providing a higher risk site is suitable for development, there should be flexibility in the Councils approach to enable such sites to come forward without the barrier of onerous constraints. Therefore, flexibility in the approach to affordable housing is encouraged. It is considered that affordable housing requirements should not prevent suitable sites coming forward for development due to the level of affordable housing required resulting in unviable development. The affordable housing thresholds set should be subject to financial viability considerations to ensure that all suitable sites can be developed. Viability considerations should also take account of affordable housing tenures and the associated splits that developers are required to provide.	Comments noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_337	Miller Strategic Land Via MRPP	Viability is now at the heart of plan-making and the Council will need to carefully ensure both policies and allocations are viable. We note the Council will be	Comments noted. The Council has or is in the process of commissioning the technical	The Council will arrange a meeting with the respondent to discuss their

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	(Richard Robeson)	commissioning a Viability Assessment and this will need to ensure that a combination of site constraints, development costs and policy requirements do not stymie development. A flexible approach to the provision of affordable housing may therefore be required.	evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations.	representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_139	Persimmon Homes Essex (Anna Davies)	The Strategic Housing Land Availability Assessment (SHLAA) should establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period. The Council should not rule out adopting a flexible approach to assist in the delivery of sites. Early discussions with landowners, agents and developers will assist in understanding what is feasible and phase the delivery of allocations accordingly to ensure that a 5-year land supply can be maintained. It should not be assumed that being flexible on the issue of affordable housing will ensure that brownfield sites can be developed. In addition to viability, factors such as alternative use values, fragmented land ownership and market attractiveness are also factors that may prevent sites coming forward for residential development. The experience in Thurrock to date has been that certain brownfield sites allocated for residential development have not come forward or been delivered to date, this is despite the ability to seek reduced levels of affordable housing through the planning application process on the basis of viability. Given the scale of development envisaged within Thurrock, the cost associated with remediation, issues around land assembly, a focus on brownfield first could seriously jeopardise the delivery of sufficient housing numbers and the establishment of a 5-year housing land supply. Persimmon Homes would strongly suggest that the Council will need to allow the development of Greenfield sites as well brownfield sites in the early part of the plan period. As stated under Question 9, the allocation of Greenfield sites and/or reserved sites will give the Council the flexibility and assurance through the phasing of their allocations to ensure that a 5-year land supply can be maintained.	Comments noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_89	Rochford District Council (Natalie Hayward)	Rochford District Council suggests that Thurrock Borough Council may wish to give consideration to a standard affordable housing delivery policy, but in the development of any affordable housing policy a caveat may be included for diversion from policy, if viability threatens the	Comments noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the

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		deliverability of a scheme, provided that robust viability evidence is available.	that the Local Plan adequately addresses the matters raised in their representations.	development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development
LPIO_429	South Ockendon Centre (Wendy Curtis)	Uncertain	Comments noted.	No further action.
LPIO_243	Starcourt Developments Ltd (Brian Cooke) Via Barton Wilmore (Justine Bailey)	In order to ensure that sustainable sites with potential viability issues do come forward, the Councils affordable housing policies have to be flexible, otherwise these sites will remain undeveloped. As a critical part of positively planning for growth para 173 of the NPPF sets out that pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-making. In short, Plans should be deliverable. However, we have concerns that variable affordable housing targets for higher risk sites is not the correct method to ensure such development can come forward. Even placing a lower affordable housing target overall will ensure that some sites still remain unviable. Any policy needs to be flexible in its wording, whilst in line with the principles of the NPPF. The threshold should not be artificially lowered to cater for high risk sites, however, the policy should include a caveat stating that a lower proportion of affordable housing could be provided where it is satisfactorily demonstrated that the site would otherwise be unviable. The point being made is that affordable housing policies need to be realistically applied, but affordable housing provision should not be sacrificed to facilitate a spatial There is an obligation to deliver an appropriate level of affordable housing in the area and this may require the allocation of additional sites to offset the discounts of affordable housing on high risk sites which the Council desires to assist to come forward.	Comments noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development
LPIO_544	Taylor Wimpey East London Via Barton Willmore (Lauren Dooley)	Absolutely. The overall level of affordable housing sought in new development should be informed by affordable housing need set out in the Strategic Housing Market Assessment, together with other local studies. However, there needs to be flexibility within Policy to allow for the provision affordable to be determined on a site-by-site basis, taking into account particular constraints for each site subject to viability assessment. For example, it is	Comments noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound

Comment ID	Consultee Details	Response to question 11 - Should the Council explore the potential for variable affordable housing targets and approaches so that difficult higher risk sites can be developed?	Officer Response	Officer Action Points
		better to deliver 10% affordable housing on a site rather than restrict any housing at all.		plan and the allocation of individual sites for development.
LPIO_456	Vivian Humphry	Apologies if I am misunderstanding this question, but does this not sum up the attitude that profit comes before anything?	Comments noted. The question is asking about whether or not it is appropriate to reduce planning obligations on difficult brownfield sites to enable them to come forward ahead of other sites which could potentially be in locations that are less sustainable.	No action required.



Responses to Question 12

Comment ID	Consultee Details	Response to question 12 - What should the Council look to do if it cannot find enough suitable brownfield sites for new pitches?	Officer Response	Officer Action Points
LPIO_475	Anthony Newell	Regrettably the Government obsession with house building along Thames Gateway leaves you no choice but to build on Green Belt. I wish it was otherwise. with regards to Gypsies - show people could the present sites be looked at with a view to expansion if the land is available in consultation with those already on the sites.	Comments noted. The Council will ensure that the respondent and other stakeholders are fully engaged in the development of the Local Plan evidence base.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_313	Cogent Land LLP Via Icen Projects Ltd (Jamie Stanley)	In summary, the Thurrock Local Plan should be positively prepared, justified and effective to accord with national requirements. It should look for opportunities and, therefore, set aspirational objectives for the Borough. These aims should boost the existing strengths of the Borough, notably at Lakeside, the Port of Tilbury and DP World London Gateway, as well as proximity to London. A job-led strategy must however not neglect the demand for new housing in the Borough. Housing delivery in Thurrock has historically fallen short of need. Consequently, a clear borough-wide priority is to support significant housing growth. This analysis will require a need to review the Green Belt and should position planned growth in those locations that can best utilise existing infrastructure, including rail linkages; serve existing employment nodes; and provide a catalyst to those areas that have historically lacked in inward investment, or face deprivation. Should this be achieved Thurrock can become a place of opportunity, enterprise and excellence. As outlined throughout, a settlement expansion to the north east of Corringham has the potential to provide much-needed homes, in a sustainable location that is within close proximity to existing services and facilities. Moreover, land to the north east of Corringham could deliver a railway station that would better serve DP World London Gateway and other regeneration sites within the area. Housing-led growth in this area also has the potential to provide a new primary school and wider flood mitigation for Stanford-le-Hope and Corringham. Moreover, homes in this location has the potential to support the economic development of DP World London Gateway, whose success remains pivotal to the new Local Plan for the next 15-years.	Comments welcomed. The Council will ensure that the respondent and other stakeholders are fully engaged in the development of the Local Plan evidence base.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_503	Daphne	Increase the use on the current traveller sites & improve	Comments noted. The Council	The Council will arrange a

<b>Comment ID</b>	<b>Consultee Details</b>	<b>Response to question 12 - What should the Council look to do if it cannot find enough suitable brownfield sites for new pitches?</b>	<b>Officer Response</b>	<b>Officer Action Points</b>
	Revell	design structure for any new build plots to make better & increased use of the areas.	will ensure that the respondent and other stakeholders are fully engaged in the development of the Local Plan evidence base.	meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_447	David Pasterfield	I am writing to you regarding Thurrock Local Plan issues and my home at Marshall Lodge Orsett Road Horndon-on-the-hill, Essex. SS178NS. In 2001 it was made a brown field site when Mr Blair learned the feeding of waste food to pigs, even though I was fully licenced to collect and process it, as this was not the real cause of the foot and mouth outbreak, it came from Welsh sheep it is very annoying. Since then my farm has had no agricultural use, most topsoil eroded when it was arable years before we bought it. The Council search refers suggested the alternative use was for building houses. On the 10 July 2016 the Chancellor George Osborne stated Councils were not building enough homes. As a long term resident of Horndon-on-the-hill I can see the need for more homes to keep shops viable. A few years ago a senior Council officer stated that Horndon-on-the-hill could no longer be called a hill top village and that my land could be classed as infilling for development.	Comments noted.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_413	EA Strategic Land Via Icen Projects Ltd (David Churchill)	EA Strategic has an interest in land to the north of Ockendon station and to the east and south east of North Road and is currently working with neighbouring landowners and local stakeholders to bring forward a sustainable urban extension, incorporating a mix of uses including housing, community, health and employment uses, through the plan-making process.	Comments welcomed. The Council will ensure that the respondent and other stakeholders are fully engaged in the development of the Local Plan evidence base.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_284	Environment Agency (Lizzie Griffiths)	Our main concerns when the council are looking for new should ensure that any allocated sites are outside areas at risk of flooding and that these developments are able to provide an acceptable method of foul water disposal.	Comments welcomed. The Council will work in partnership with the respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils

<b>Comment ID</b>	<b>Consultee Details</b>	<b>Response to question 12 - What should the Council look to do if it cannot find enough suitable brownfield sites for new pitches?</b>	<b>Officer Response</b>	<b>Officer Action Points</b>
				obligations under the Duty to Cooperate.
LPIO_402	Essex and Suffolk Water Via Savills (David Henry)	National policy and the existing Core Strategy both encourage the effective use of land. This includes reusing existing sites particularly where they have good access to existing services and contribute effectively to meeting local needs. Within Thurrock, there is a limited supply of as yet uncommitted or undeveloped Brownfield land. The redundant Vange water treatment works would fall into this category. It is our opinion that the efficient reuse of such sites should be prioritised within the emerging new Local Plan over the release of alternative Greenfield sites in the first instance. However, it is accepted that it is likely that Greenfield land releases will also be required to meet objectively assessed need. Sites such as at Vange can be brought forward quickly and effectively early in the plan period and thus make a material contribution towards satisfying 5-year housing lands requirements. Although part of the site is in active use (in this case for open storage) an alternative use, particularly housing, would be likely to have no greater impact on its surroundings than its existing use. Accordingly, we request that you should identify sites including the former Vange Water Treatment Works as being suitable and justifiable development proposals.	Comments noted. The South Essex Housing Market Assessment (SHMA) will provide evidence of the need for new housing in the Borough and the types of housing required to meet the Thurrock's Objectively Assessed Housing Need (OAN) in full. The Thurrock Housing Land Availability Assessment (HLAA) will consider the planning merits of the respondents site and the outcome of this process will inform any future decisions on whether to allocate the site(s) in the Local Plan for development.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_215	Essex County Council (Lesley Stenhouse)	ECC notes the inclusion of provision for Gypsy, Traveller and Travelling Show people within the local plan and housing provision as a whole.	Support welcomed. The Council will ensure that the respondent and other stakeholders are fully engaged in the development of the Local Plan evidence base.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_44	Industrial Chemicals Ltd Via Lawson Planning Partnership Ltd (Aarti O'Leary)	No observations.	Comments noted.	No further action.
LPIO_387	Natural England (Jamie Melvin)	Pitches for gypsies, travellers and travelling show people require similar consideration to all other allocations. The Council will be aware that many brownfield sites in the district hold elevated biodiversity and nature conservation interest, and should be regarded as being of high	Comments welcomed. The Council will ensure that the respondent and other stakeholders are fully engaged in the development of the Local	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the

Comment ID	Consultee Details	Response to question 12 - What should the Council look to do if it cannot find enough suitable brownfield sites for new pitches?	Officer Response	Officer Action Points
		<p>environmental value (NPPF paragraph 11 In addition to references provided under question 4, the Council is also referred to the DEFRA NERC Act section 41 open mosaic habitat inventory (NB this site is temporarily closed, at the time of writing). The Council should ensure that the existing environmental value of brownfield sites is factored into any allocations. Please note that habitat inventories are not exhaustive, and so an appropriate level of information should be sought to inform any such allocation. When proposing the development of greenfield sites, appropriate weight should be given to the roles performed by the areas soils. These should be valued as a finite multi-functional resource which underpin 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.</p>	<p>Plan evidence base.</p>	<p>development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>
LPIO_129	<p>Scott Properties (Martin Scott) Via Icen Projects Ltd (Leo Scarfe)</p>	<p>The land north of Avontar Road, South Ockendon will help realise Thurrock Councils aspirations, bringing benefits too South Ockendon. The site is previously developed, and remains contaminated from historic use as a landfill site. It is bound by existing built form. In these circumstances it performs no meaningful Green Belt function. The site is located within a highly sustainable location with good transport networks connecting future residents of the site to the wider Essex area and London. There are a number of existing community facilities situated within close proximity of the site, with two schools, a church, community centre and South Ockendon town centre located within walking distance. The release of this site for development can assist some of those organisations in realising their ambitions to improve the range of education, community and leisure facilities that are available to residents of South Ockendon. The site is also located less than two miles from Lakeside Retail Park. Thurrock Council is actively promoting Lakeside as a hub for economic growth with development proposals for: 3,000 new homes; Additional retail units providing a further 7,000-9,000 jobs; Leisure and recreation facilities; Green space; and Improvement to pedestrian movement. This planned growth will provide additional job opportunities for people moving to the western part of Thurrock and it is important that the emerging plan encourage the development of new dwellings in areas surrounding new economic investment.</p>	<p>Comments welcomed. The Council will ensure that the respondent and other stakeholders are fully engaged in the development of the Local Plan evidence base.</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>

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		<p>This therefore makes areas such as South Ockendon a key area for development. The area to the north west of South Ockendon has already been identified as an area for significant change, with planning permission having been granted in 2011 for the redevelopment of the old Ford factory site with 650 dwellings. By approving this scheme, the Council have recognised that this area of South Ockendon is a sustainable location for residential development. Phase two of this scheme is currently in the process of being developed. Despite being located in the Green Belt, it is clear that the proposed site does not serve the five purposes of the Green Belt as set out in paragraph 80 of the NPPF. The site adjoins the existing development boundary of South Ockendon and has an existing access point linking the site to the village via Daiglen Drive. We therefore suggest that this previously developed land provides an obvious location to extend the development boundary and deliver some of Thurrock's housing need.</p>		
LPIO_130	<p>Scott Properties (Martin Scott) Via Icen Projects Ltd (Leo Scarfe)</p>	<p>The land south of Stifford Road, Aveley provides an excellent opportunity to provide new dwellings, contributing towards the required housing demand within Thurrock. The site is located within a sustainable location, with good access off Junction 30 of the M25 and within walking distance of a number of key community facilities such as Aveley Primary School, St Michaels church and Aveley High Street. The site is also located approximately one mile from Lakeside Retail Park. Thurrock Council is actively promoting Lakeside as a hub for economic growth with development proposals for: 3,000 new homes; Additional retail units providing a further 7,000-9,000 jobs; Leisure and recreation; Green space; and Improvement to pedestrian movement. This planned growth will provide additional job opportunities for people moving to the western part of Thurrock and it is important that the emerging plan encourage the development of new dwellings being located in areas surrounding new economic investment. This therefore makes areas such as Aveley a key area for development. Although located within the Green Belt, it is suggested that the site does not meet the five clear purposes of the Green Belt. The site is bordered by the Aveley development boundary, the M25 to the east and the A13 to the south. These main roads act as a clear boundary between Aveley and the wider Green Belt. Development of the proposed site would therefore not cause encroachment into the surrounding countryside. As such the site does not perform a clear Green Belt function. Thurrock Council cannot provide the required number of dwellings through a Brownfield led</p>	<p>Comments welcomed. The Council will ensure that the respondent and other stakeholders are fully engaged in the development of the Local Plan evidence base.</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>

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		<p>plan alone (historic delivery rates prove this to be the case). Scott Properties recognise the need for the Plan to continue to prioritise brownfield development. However, this should not affect the clear need to provide significant levels of homes on sustainable greenfield and Green Belt land if the Council are to bring forward a sound Plan. Improvements to Infrastructure and the road network are essential within the Borough to help ensure the delivery of housing and commercial development. Therefore, as part of the proposed plans for the site south of Stifford Road, Aveley a new southern relief road that will help to release pressure from Aveley High Street and encourage HGV traffic away from the High Street. The release of the site for development would also facilitate the provision of a dedicated drop off point for the school, and the provision of access for the church to deliver a hospice, hall and car parking.</p>		
LPIO_430	South Ockendon Centre (Wendy Curtis)	Provide Planning permission for Showman Based in Buckles Lane for the past 30 years.	Comments noted. The Council will ensure that the respondent and other stakeholders are fully engaged in the development of the Local Plan evidence base.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_457	Vivian Humphry	Try harder! See answerer to Question 9 and 1	Comments noted. The Council will ensure that the respondent and other stakeholders are fully engaged in the development of the Local Plan evidence base.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.



Responses to Question 13

Comment ID	Consultee Details	Response to question 13 - What are the main barriers to growth that need to be addressed in the Local Plan to ensure that all sections of the community have access to the benefits of future employment creation in Thurrock?	Officer Response	Officer Action Points
LPIO_476	Anthony Newell	Inadequate infrastructure. Thurrock needs its own hospital-AE Department. More GP surgeries, schools, better care in the community more care homes. Adequate staff for social services, police Fire ambulance. Better roads in the Borough. The population is increasing at the same time as the Borough services are shrinking.	Comments noted. The Council will undertake a full Health Impact Assessment as a key element of the Integrated Assessment (SA/SEA/HIA/EqIA) being prepared in support of the Local Plan. The Council will also work in close partnership with service providers to ensure that future health and growth needs are aligned and met by the provision of improved service and facilities where it is necessary and appropriate to do.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_504	Daphne Revell	Grays should be more offices to generate more local employment opportunities. Too many food-coffee shops in Grays & surrounding areas. Encourage London companies to outsource offices into Grays, Purfleet, Tilbury area.	Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region including Thurrock over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development
LPIO_106	DP World - London Gateway Via Trevor Hutchinson Planning and Transportation Ltd (Trevor Hutchinson)	Lack of appropriate skills and transport constraints.	Comments noted. The Council will ensure that the respondent and other stakeholders are fully engaged in the development of the Local Plan evidence base.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for

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				development.
LPIO_216	Essex County Council (Lesley Stenhouse)	<p>JOB CREATION Please refer to the relevant evidence and links to the Economic Plan for Essex 2014 (EPfE) and A127 Corridor for Growth - An Economic Plan, 2014, for context and to identify cross boundary projects, issues and opportunities which require co-investment; as set out in response to questions 1 and 2 above. As set out in response to Question 1, Thurrock Local Plan should have regard these projects and to the emerging local plans in the respective Essex authorities, especially Brentwood BC and Basildon BC. Additional investment in rail and road infrastructure is essential for unlocking the full economic potential of the corridor, and a package of investment is proposed to address bottlenecks on the A12 to support growth. ECC consider two key elements and barriers to development are infrastructure and connectivity. The latter is particularly important where poor quality environment and severance created by transport networks need to be overcome to connect community to employment sites. Connectivity is also increasingly important in respect of Broadband and sites with excellent bandwidth will be very attractive to certain types of user. In terms of infrastructure, capacity of the existing networks (both transport and digital) will need to be sufficient to enable sites to come forward, but the benefit would be to the wider community. This is where alternative funding mechanisms and even intervention by the public sector may help to both overcome existing capacity problems but also provide the headroom to accommodate growth ambitions.</p>	Comments noted. The Council will ensure that the respondent and other stakeholders are fully engaged in the development of the Local Plan evidence base.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_297	Gladman Developments Ltd (Phil Bamford)	<p>Gladman consider that one of the main barriers to economic growth is the lack of suitable, available and affordable housing to ensure that a healthy workforce can be maintained to support economic growth. This may particularly be the case as many jobs that are traditionally in lower paid sectors where access to affordable and low cost housing is essential to allow growth of the workforce.</p>	Comments noted. The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

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			to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	
LPIO_97	Hammersons PC Via RPS Group (Paul Alderidge)	The Issues and Options (Stage 1) document recognises a range of different uses contribute towards the Boroughs economic prosperity, including retail development. An updated Retail Study is required to inform the Local Plan and will assist in identifying the need or otherwise to allocate additional land for new retail and leisure floorspace. It is important that the emerging policy framework for the Local Plan, like its predecessor, continues to support the management of existing retail floorspace. Policy needs to be flexible enough to respond to the needs of existing retailers enabling them to adapt to current and future market conditions and also ensure the expedient take up of vacant floorspace by means of redevelopment and/or extensions etc. to attract new retailers thereby ensuring economic benefits are sustained in terms of job retention and creation, maintaining a competitive retail market and delivering a choice and range of retail outlets.	Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region including Thurrock over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_45	Industrial Chemicals Ltd Via Lawson Planning Partnership Ltd (Aarti O'Leary)	The emerging Local Plan should allocate sufficient sites and provide a favourable policy basis for employment led investment and associated development. It is vital that the costs and financial viability constraints associated with the redevelopment of brownfield sites for employment purposes is recognised by the Council, particularly in relation to the level of financial contributions sought for infrastructure provision through planning obligations,	Support noted. The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound

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		which ought to be discounted, as appropriate, in acknowledgement of the job security and job generation benefits arising.	will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	plan and the allocation of individual sites for development.
LPIO_169	Port of Tilbury (Perry Gladding) Via Vincent and Gorbing (Hannah Philips)	The main barriers to growth are considered by PoTLL: - Sufficient land in the right commercially attractive locations to allow for further private sector development; - Sufficient infrastructure particularly the road network, but also investment in public transport to accommodate further development; - Environmental issues such as air quality that need to be addressed so as to avoid environmental capacity preventing the potential within the Borough being realised. These issues need to be addressed in order to deliver the significant potential in employment growth that exists in Thurrock. Alongside these matters, having a suitably skilled workforce will be critical. PoTLL are leading the way in this regard, with over 50 apprentices working across the Port undertaking apprenticeships and/or apprenticeship qualification programmes over the past 18 months. The port has recently taken on 30 apprentices with a further 15 planned in 2016. Whilst education and training is largely outside of	Comments noted. The Council will ensure that the respondent and other stakeholders are fully engaged in the development of the Local Plan evidence base.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

<b>Comment ID</b>	<b>Consultee Details</b>	<b>Response to question 13 - What are the main barriers to growth that need to be addressed in the Local Plan to ensure that all sections of the community have access to the benefits of future employment creation in Thurrock?</b>	<b>Officer Response</b>	<b>Officer Action Points</b>
		the ambit of land use planning, the planning process itself can proactively engage with local employment initiatives. PoTLL would want to see this recognised in the Local Plan.		
LPIO_304	SEGRO Industrial Estates Ltd Via Barton Wilmore (Gemma Johnson)	New employment opportunities should be provided in sustainable locations which are accessible to the local community. It is important to consider locations which can be reached by a range of transport options, including public transport, walking and cycling. This will ensure that employment opportunities, and the benefits arising from these, are accessible to a wide spectrum of the local community.	Comments noted. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Essex County Council, Highways England, Network Rail, Transport for London and other transport service and infrastructure providers. This work will need to consider the impact of development on both the national and local transport networks serving the Borough.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate
LPIO_431	South Ockendon Centre (Wendy Curtis)	Poor Transport Facilities I.e. Buses.	Comments noted. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Essex County Council, Highways England, Network Rail, Transport for London and other transport service and infrastructure providers. This work will need to consider the impact of development on both the national and local transport networks serving the Borough.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate
LPIO_244	Starcourt Developments	As noted within the Issues and Options document, the forecast for the Thurrock economy is positive, with	Comments noted. The production of the Local Plan is	The Council will arrange a meeting with the respondent

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	Ltd (Brian Cooke) Via Barton Wilmore (Justine Bailey)	predicted growth of 2% per annum between 2012 and 2030, and that total employment will grow by an average of 5% a year, equivalent to an increase of 21,200 jobs in Thurrock over the same period. Paragraph 22 highlights the disadvantage of long term protection of sites allocated for employment uses, and the need to regularly review land allocations. Sites that have not yet come forward that have been in the Plan should be further scrutinised to assess whether it will realistically come forward. As with the supply of housing, land availability is the main barrier to growth. Again, brownfield sites are highly unlikely to be able to provide the amount of land required to bring employment forward, and therefore the Council needs flexibility in how such land will be allocated. It is likely that this will require Green Belt release in the most appropriate locations, such as those locations adjacent to the existing built form and employment uses, with links to public transport. Such sites should be given priority.	being underpinned by the preparation of a wide range of need and capacity studies consistent with the policy approach and guidance set out in the NPPF and PPG. This includes the SE SHMA, the Thurrock HLAA and the Thurrock Green Belt Assessment. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs. At this stage in the plan-making process no evidence has been submitted to the Council which supports the need for Thurrock to allocate land to meet the future development needs of any adjoining area. Should this be the case in future the Council work with neighbouring authorities to resolve this issue through the Duty to Cooperate process.	to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_527	Tenens (Lakeside) Ltd Via Barton Wilmore (Lauren Dooley)	The emerging TLP should move away from the previous Core Strategy's approach which only supported economic growth on land in five Key Strategic Hubs (Purfleet, Lakeside/West Thurrock, Grays Town Centre, Tilbury and London Gateway. The allocation of Key Strategic Hubs should not be a barrier to additional economic growth	Comments noted. The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust



Comment ID	Consultee Details	Response to question 13 - What are the main barriers to growth that need to be addressed in the Local Plan to ensure that all sections of the community have access to the benefits of future employment creation in Thurrock?	Officer Response	Officer Action Points
		<p>elsewhere in the Borough in the emerging TLP. Each community within Thurrock requires employment provision at a local as well as a Borough level. In South Ockendon for instance, large amounts of previously employment land has been lost in the last decade to residential use. There are now relatively few employment opportunities within South Ockendon which leads to residents having to travel further to find work, and perhaps out of the Borough, which is unsustainable and has an impact on the local economy. The emerging TLP should identify new employment land across Thurrock which can be accessed by each of the local communities. The Land South of Stifford Road represents an opportunity to meet a need in South Ockendon. Further, it is vital that future growth opportunities are not restricted to the port, logistics and retail sectors. Restricting growth in these areas would not fully meet the needs of the existing local community and could create social imbalance. It is important to encourage employment growth in all respects, and in particular to support the growth of existing smaller businesses within Thurrock.</p>	<p>housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.</p>	<p>evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>
LPIO_553	The Billings Group Via DHA (David Bedford)	<p>At present the Council is overly protective of poor quality and low grade employment sites that provide a fairly limited contribution to the local economy. These include some sites that have developed with the passage of time, such as our clients land at Sandy Lane. In our view, the most prudent strategy would be to put in place a strategy and identify suitable new sites to encourage higher quality and more attractive employment facilities situated in locations more appropriate to their operations. In turn, the low grade employment land can be recycled to provide much needed new housing.</p>	<p>Comments noted. The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>

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			<p>to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.</p>	

**Response to Question 14**

<b>Comment ID</b>	<b>Consultee Details</b>	<b>Response to question 14 - Do you think there is a need to identify additional land for employment? and what other employment uses outside of the port, logistics and retail sectors should the Local Plan support and promote?</b>	<b>Officer Response</b>	<b>Officer Action Points</b>
LPIO_505	Daphne Revell	The Railway Club in Tilbury would be a wonderful site to develop for either leisure or employment opportunities & has been left derelict for many years now.	Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_107	DP World - London Gateway Via Trevor Hutchinson Planning and Transportation Ltd (Trevor Hutchinson)	Need to identify suitable land for services which play a supporting role to the primary port, logistics and retail industries (e.g. lorry parking, servicing etc.)	Comments noted. The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

Comment ID	Consultee Details	Response to question 14 - Do you think there is a need to identify additional land for employment? and what other employment uses outside of the port, logistics and retail sectors should the Local Plan support and promote?	Officer Response	Officer Action Points
			which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	
LPIO_217	Essex County Council (Lesley Stenhouse)	Please refer to our response to Question 1 concerning Employment evidence and links to the new South Essex Economic Development Needs Assessment.	Comments noted. The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

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LPIO_535	George Watts	Twin approach, regard should be given to the educational standards reached by the present population and the technological advances being made nationally. Foremost in our planning should be training to improve the existing standards and for new types of work. Our college education facilities in Grays should be upgraded to University Campus status. It is quite possible for work places to be located alongside residential areas subject to careful planning so small high tec/IT companies could be almost anywhere in town centres. No more major roads.	Comments welcomed. The Council will ensure that the respondent and other stakeholders are fully engaged in the development of the Local Plan evidence base.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_380	Goodman Via Barton Willmore (Simon Flisher)	Goodman endorse the recognition in the consultation document that the main employment sectors in the Borough include transport and logistics, as well as port functions and retail (para 33). Further, Goodman support the approach in the consultation document to develop a clear understanding of business needs within the economic markets operating within the Borough, by undertaking an assessment of the need for additional land or floorspace for economic development. In this way, Goodman has duly submitted a completed Call for Sites Form, to ensure that Purfleet Commercial Park continues to be recognised and allocated in the new Local Plan as a sustainable site for logistics employment development. In addition, to ensure the correct identification of the extent of any employment allocation for the site in the new Local Plan, please find enclosed the Proposed Site Plan (ref. 105 rev. F) approved under the abovementioned extant planning permission. This plan outlines in green the extent of the approved developable area for the site, and Goodman consider that the extent of any employment allocation for the site should accord with this area.	Support noted. The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

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			development needs.	
LPIO_417	Greater London Authority (Jorn Peters)	The Council is already providing land for industry and logistics at a significant scale. However, in the light of the strategic position of Thurrock within the wider transport network and its proximity to London and its Opportunity Areas, the Council may also wish to consider wider land requirements for these uses. In this context, please note the London Industrial Land Supply and Economy Study 2015 <a href="https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-technical-and-research-reports">https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-technical-and-research-reports</a> (see section on economy), as this also looks into industrial capacity beyond London's boundary.	Comments noted. The Council recognises the importance of the River Thames in contributing to the future economic growth and development of Thurrock. The issues raised by the respondent will be considered by the South Essex Economic Development Needs Assessment (SE EDNA) and the Thurrock Employment Land Availability Assessment (ELAA)	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_46	Industrial Chemicals Ltd Via Lawson Planning Partnership Ltd (Aarti O'Leary)	As outlined in LPPs accompanying Statement, there has been a long term and serious trend of short falling against the Core Strategy annual employment land supply target, resulting in a cumulative shortfall of -175 ha since 2001, representing an under delivery of 79%. There is a clear need for a significant level of developable (including owner occupied) employment land to be identified in the Plan, with its delivery to be facilitated by favourable policy objectives for each site. With this in mind, the allocation of approximately 35ha of employment land at ICLs West Thurrock Works and Titan Truck Park is sought, which would make a significant contribution to meeting Thurrock's job security and job generation needs.	Comments noted. The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.



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			and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	
LPIO_355	Medway Council (Catherine Smith)	Medway Council recognises the importance of the wharfage infrastructure due to its own location on abutting two Rivers (Thames and Medway). It is also noted that there any planned expansion or change to the port facilities along the Thames within Thurrock have an impact on Medway's own port infrastructure and that a dialogue should be open between the two authorities to carefully manage this network. As a part of Medway Councils own evidence base work a Strategic Housing and Economic Needs Assessment (SHENA) was commissioned. This reviewed the present employment scenario and they forecast the growth and employment land required over our own plan period (2012-2035). This work	Comments noted. The Council recognises the importance of the River Thames in contributing to the future economic growth and development of Thurrock. The issues raised by the respondent will be considered by the South Essex Economic Development Needs Assessment (SE EDNA) and the Thurrock Employment Land Availability Assessment (ELAA)	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_338	Miller Strategic Land Via MRPP (Richard Robeson)	As with other development 'types' there is a duty on the Council to plan appropriately for employment development, having regard to market signals and the relative need for different land uses. It is noted that the Council is undertaking an Employment Land Availability Assessment, the outcomes of which should be used to make judgements on the scale of any future employment land allocations or releases. There may also be situations where 'land swaps' become appropriate, where potentially non-conforming uses can be moved to new sites and the existing land released for beneficial redevelopment.	Comments noted. The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

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			Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	
LPIO_170	Port of Tilbury (Perry Gladding) Via Vincent and Gorbing (Hannah Philips)	PoTLL consider that the Local Plan must focus on building on the strength of Thurrock. Whilst there may well be benefit in encouraging economic diversification into sectors under-represented in the Borough, the port and logistics sectors offer significant growth potential and will continue to be fundamental to the success of the Borough in the future. As highlighted previously, PoTLL will be making separate representations to the Councils Call for Sites exercise regarding their land at the former Tilbury Power Station. The Local Plan needs to plan positively for this land, which represents a huge opportunity for future Port-related development, given its location close to the Port and its access to a deep-water jetty. In addition, with the success of London Distribution Park, positive consideration needs to be given as to whether there is potential for future expansion at this location.	Comments noted. The Council recognises the importance of ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_275	QUOD	Thurrock Council is correct in focusing development within Thurrock's urban area and major growth hubs and	Comments noted. The Council recognises the importance of	The Council will arrange a meeting with the respondent

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		<p>prioritising the development of brownfield land is in line with national guidance. However, it is unlikely that there is sufficient land available to meet the employment needs of the borough beyond 2022. The most recent Employment Land Review Update (2012) concludes that Thurrock has sufficient available employment land supply to meet projected demand throughout the Plan period, although supply is reliant on a number of key sites and use classes. Given Thurrock's location close to the river, the ports and strategic road network, there is high demand for employment land in Thurrock. In terms of specific employment land use requirements, the Employment Land Review update considers that the Boroughs strengths will remain in the distribution sector. The release of sites which are of low environmental value or in employment areas and next to the strategic road network should be considered for release for employment uses, particularly Class B8 (storage and distribution). The effect of warehousing and manufacturing can result in transport, highways, noise and other effects on residents but there are Green Belt sites situated away from existing housing areas which are perfect for employment uses that would have minimal impact on the boroughs residents. A lack of large scale office development in the Borough was highlighted within the ELR and sites are required to meet this need, for offices. Offices are best located town centres, whilst other employment sites should have directed to strategic locations, easily accessible by road. A Green Belt Review would identify the lower quality Green Belt sites with close links to the strategic road network which could be reviewed and considered for employment development.</p>	<p>ensuring the broad alignment of future housing and employment needs, including the need to increase levels of housing delivery to support economic growth. These issues will be considered in the preparation of the SE EDNA and SE SHMA which have been jointly commissioned by the South Essex authorities. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.</p>	<p>to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>
LPIO_305	SEGRO Industrial Estates Ltd Via Barton Wilmore (Gemma Johnson)	<p>The approach to identifying additional land for employment use within the Borough is supported. As detailed in our response to Question 4, it has been identified that an additional 21,200 jobs will need to be delivered within the Borough during the period 2012-2030. Paragraph 36 of the Local Plan Issues and Options consultation document goes on to state that the rate of job growth in Thurrock has been faster than both the regional and national average in recent years. In order to accommodate this projected job growth, it is considered that additional employment land will need to be identified within the Borough through the Local Plan. It is noted that</p>	<p>Comments noted. The Council recognises the importance of the River Thames in contributing to the future economic growth and development of Thurrock. The issues raised by the respondent will be considered by the South Essex Economic Development Needs Assessment (SE EDNA) and the Thurrock Employment Land</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.</p>

Comment ID	Consultee Details	Response to question 14 - Do you think there is a need to identify additional land for employment? and what other employment uses outside of the port, logistics and retail sectors should the Local Plan support and promote?	Officer Response	Officer Action Points
		Thurrock are currently undertaking a Call for Sites which includes employment sites. This early opportunity to submit sites for consideration is welcomed and Barton Willmore have submitted details of land adjacent to Ponds Farm, Purfleet on behalf of SEGRO Plc. This Site benefits from an allocation within the adopted Core Strategy Proposals Map as a Secondary Industrial and Commercial Area, as well as Outline Planning Permission for B2/B8 and ancillary B1a uses (ref: 12/00862/OUT).	Availability Assessment (ELAA)	
LPIO_245	Starcourt Developments Ltd (Brian Cooke) Via Barton Wilmore (Justine Bailey)	The Issues and Options document summarises the growth of the economy and the need for new jobs within Thurrock between the period of 2012 and 2030. As noted within the answer to question 13, additional land will be necessary given the land pressures that exist within the Borough, especially when combined with housing land supply. With regard the type of employment uses, the Local Plan should be flexible given likely changes in supply and demand over the plan period. The strength of the region is related to the Port, and ancillary employment uses should be encouraged. However, the location and excellent transport routes should encourage a range of other businesses to flow into the Borough. The Council should not be looking to choose their preference, but should allow the market to decide.	Comments noted. The Council recognises the importance of the River Thames in contributing to the future economic growth and development of Thurrock. The issues raised by the respondent will be considered by the South Essex Economic Development Needs Assessment (SE EDNA) and the Thurrock Employment Land Availability Assessment (ELAA)	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_528	Tenens (Lakeside) Ltd Via Barton Wilmore (Lauren Dooley)	The emerging TLP should move away from the previous Core Strategy's approach which only supported economic growth on land in five Key Strategic Hubs (Purfleet, Lakeside/West Thurrock, Grays Town Centre, Tilbury and London Gateway. The allocation of Key Strategic Hubs should not be a barrier to additional economic growth elsewhere in the Borough in the emerging TLP. Each community within Thurrock requires employment provision at a local as well as a Borough level. In South Ockendon for instance, large amounts of previously employment land has been lost in the last decade to residential use. There are now relatively few employment opportunities within South Ockendon which leads to residents having to travel further to find work, and perhaps out of the Borough, which is unsustainable and has an impact on the local economy. The emerging TLP should identify new employment land across Thurrock which can be accessed by each of the local communities. The Land South of Stifford Road represents an opportunity to meet a need in South Ockendon. Further, it is vital that future growth opportunities are not restricted to the port, logistics and retail sectors. Restricting growth in these areas would not	Comments welcomed. The Council will ensure that the respondent and other stakeholders are fully engaged in the development of the Local Plan evidence base.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

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		fully meet the needs of the existing local community and could create social imbalance. It is important to encourage employment growth in all respects, and in particular to support the growth of existing smaller businesses within Thurrock.		

Responses to Question 15

Comment ID	Consultee Details	Response to question 15 - What do you think are the key challenges facing Thurrock's retail centres and how can the Local Plan maintain and enhance their role?	Officer Response	Officer Action Points
LPIO_477	Anthony Newell	I think small businesses are being hampered by the non-stop legislation being emitted from Europe. So much red tape. Help these businesses deal with the red tape.	The issue is outside the remit of this Consultation.	No further action.
LPIO_268	Arena Leisure Enterprises Ltd (Lesley Wootten) Via GL Hearn (David Maxwell)	Key challenges facing Lakeside Regional Centre as a retail centre include: (i) adequate land supply to provide a full and wide range of ancillary recreation and leisure uses, such as a green route from the River Thames to the Mardyke Valley; (ii) adequate land to provide additional new homes to create a sustainable truly mixed use centre; (iii) provision of green infrastructure and connectivity to all new and existing homes within the locality; and (iv) space to continue to expand as a high quality retail destination providing a range of retail and leisure uses throughout the Plan period and beyond, including water sports and leisure uses at Northern Lake and provision of higher education facilities. It is submitted that land at Arena Essex should be allocated for development within the emerging Local Plan to ensure that the Lakeside can continue to grow and prosper as the principal retail and leisure destination within Thurrock, and for the region.	Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region including Thurrock over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_506	Daphne Revell	Access by road. Gridlock to from Lakeside often means people do not want to risk travelling there.	Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace. As part of the process of preparing the new Local Plan the Council will need to review the current policy approach for Lakeside and to update the quantitative	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.



Comment ID	Consultee Details	Response to question 15 - What do you think are the key challenges facing Thurrock's retail centres and how can the Local Plan maintain and enhance their role?	Officer Response	Officer Action Points
			<p>projections for future retail and convenience shopping needs set out in the adopted Core Strategy. The Council has also prepared the Lakeside Development Framework and the Lakeside Transport Strategy to help inform the preparation of an Inset Plan to manage the future development of the area. Both studies are available to view on the Councils Local Plan website. The Council will engage proactively with neighbouring local authorities through the Duty to Cooperate process to ensure the proper management and development of a competitive and viable network of centres across the Thames Gateway and East London.</p>	
LPIO_323	Ellandi LLP (Mark Robinson) Via Savills (Chris Moore)	<p>The key challenge facing Grays and the other network of centres within Thurrock is the continued threat from out of centre retail development. The Councils intention to give Lakeside regional centre status has required Grays to become the focus for cultural, administrative and education facilities, whilst providing retail development that is complimentary to the Lakeside Basin. The ability to do this effectively means that further out of centre retail should be resisted by the Council. The Council should also ensure that lakeside is not allowed to diversify its offer into administrative and education functions. Outside of Grays Town Centre (and indeed other allocated centres) where main town centre uses are proposed, the NPPF requirement for undertaking sequential and impact assessment should be strongly advocated within the Local Plan. We would also recommend the inclusion of a locally set threshold for requiring retail impact assessments to be undertaken for proposals for edge and out of centre retail development. This should be informed by evidence which acts to justify such a threshold. Whilst the NPPG recognises that it may not be possible to accommodate all forecast needs in a town centre, this does not automatically mean that proposals should be directed to out of centre retail parks. Instead, planning authorities are</p>	<p>Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region including Thurrock over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace.</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>

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		directed to plan positively to identify the most appropriate alternative strategy for meeting the need for these main town centre uses, having regard to the sequential and impact tests (Paragraph: 006 Reference ID: 2b-006-20140306). This is to ensure that any proposed main town centre uses which are not in an existing town centre are in the best locations to support the vitality and vibrancy of town centres, and that no likely significant adverse impacts on existing town centres arise. Any sites allocated in edge or out of centre locations (such as an extension to the Primary Shopping Area) should be identified as reserve sites that might deliver retail development towards the end of the Plan period, subject to regular updates of capacity forecasts. This approach would accord with the town centre first requirement of the National Planning Policy Framework (NPPF) along with providing flexibility over the longer term to deliver planned retail needs if 1) Plan-led need exists; and 2) suitable evidence is provided to demonstrate that the town centre allocations cannot be delivered during the lifetime of the Plan and the sequential and impact tests are met. Local Plans that correctly interpret and include the plan making requirements of the NPPF as set out above give confidence to investors to take forward town centre development projects.		
LPIO_218	Essex County Council (Lesley Stenhouse)	The potential diversification of uses at Lakeside and the promotion of uses other than retail to drive up footfall should be considered.	Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region including Thurrock over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_254	Gravesham Borough Council (Wendy Lane)	This response is a more general one on retailing and leisure (Q15, 17 + 18) Policy ETG2 of the East of England Regional Strategy, as amended by the Thurrock Lakeside Single Issue Review, defined the northern part of the Lakeside Basin as a Regional Centre. It set out various	Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the

Comment ID	Consultee Details	Response to question 15 - What do you think are the key challenges facing Thurrock's retail centres and how can the Local Plan maintain and enhance their role?	Officer Response	Officer Action Points
		<p>measures to be pursued through Local Development Documents (LDD) to secure the transformation of the northern part of the Lakeside Basin as a town centre. The Thurrock Core Strategy Policy CSTP7 refines the regional policy by providing an indication of the quantum of development of housing, retail and employment floorspace that will take place at Lakeside, and the type and levels of new development to be provided in Grays. In November 2010 during the course of the LPCS examination, Thurrock made the decision not to produce an AAP for Lakeside, but instead to include a Lakeside specific chapter in the Site Specific Allocations Development Plan Document with delivery and implementation matters set out in a Lakeside Delivery and Implementation SPD. Gravesham BC notes that it was intended that the identification of the boundaries of the Regional Centre would more appropriately also be dealt with in the Specific Site Allocations DPD. As explained in this consultation, in February 2014 the Council decided to commence work on a new Local Plan for Thurrock rather than continue with these other documents. Gravesham BC made representations on the Thurrock Lakeside Single Issue Review and supports in principle the policy decision that came from that and has it has been embedded into the current Core Strategy. However, as the Thurrock Issues and Options report highlights in para 44, since the adoption of the Core Strategy in 2011, the retail landscape has changed dramatically with far reaching implications for the demand for retail and leisure development both across the UK and within Thurrock. Therefore, new evidence is needed to fully understand Lakeside in its regional context and the potential impact of policy options for new retail and leisure development, on other centres in Thurrock and wider.</p>	<p>retail needs and capacity across the sub-region including Thurrock over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace.</p>	<p>development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>
LPIO_98	Hammersons PC Via RPS Group (Paul Alderidge)	<p>As previous retail studies prepared for the Council and other evidence accept, Thurrock's town centres have adapted over time to the changing retail climate including any effects associated with the retail facilities located at Lakeside. In recognition of this the Thurrock Core Strategy promotes, subject to certain conditions being met, the creation of a new town centre at Lakeside focused upon the regional shopping centre. This will include the introduction of a wider range of town centre uses together with additional retail and leisure floorspace. In this respect, it is important that the role and function of existing town centres continue to differentiate themselves from the retail offer found at Lakeside, building upon existing key</p>	<p>Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region including Thurrock over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>

Comment ID	Consultee Details	Response to question 15 - What do you think are the key challenges facing Thurrock's retail centres and how can the Local Plan maintain and enhance their role?	Officer Response	Officer Action Points
		strengths.	network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace	
LPIO_47	Industrial Chemicals Ltd Via Lawson Planning Partnership Ltd (Aarti O'Leary)	No observations at this stage.	Comments noted	No further action
LPIO_76	Intu Lakeside Ltd (Marc Myers) Via Nathaniel Lichfield & Partners (Stephanie Walker)	The key challenge for Thurrock's retail centres, including intu Lakeside, is to remain competitive (in the face of competition from other centres and the internet) and to continue to serve the needs of its residents and others who work in or visit this area. These challenges comprise many different issues ranging from the threat posed by other large shopping centres, such as Bluewater and Westfield; to meeting the needs arising from changing consumer habits, whether that be from increased on-line shopping, or the need to provide for the growth in demand for food and beverage and leisure. The Local Plan can play a vitally important role in providing certainty to existing stakeholders and other investors who wish to invest in Thurrock over the plan period. For intu this will help ensure that intu Lakeside can continue to perform its role as a major provider of goods and services and meet the challenges outlined above. This is very important to the future of the wider Thurrock economy in view of the numbers of jobs and the wider wealth creation benefits of the shopping centre. The Local Plan must therefore positively plan for growth this includes intu Lakeside and the other smaller centres in Thurrock. The Local Plan should also support the transformation of the Lakeside Basin to a new regional town centre building on policy within the Core Strategy. CSTP7 supports 50,000 sq. m of additional comparison retail as well as commercial leisure floor space in the Lakeside Basin by 2019. The Core Strategy has provided a positive framework for intu to progress development projects and secure planning permission for projects at intu Lakeside with an investment value of close to £300 million. The Local Plan must continue to support growth in the Lakeside Basin to enable this key economic driver within the region to prosper and provide for the growth needs of Thurrock.	Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region including Thurrock over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

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LPIO_356	Medway Council (Catherine Smith)	Will the potential impact of London paramount development be analysed as a part of the evidence base work for the Local Plan? Medway Councils own research has suggested that were this development to come forward the knock on effects would be significant for our own borough. While Thurrock would not be as directly impacted the impact should be noted as it may have a pull on the retail offer of areas within Thurrock, such as Lakeside.	Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region including Thurrock over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_433	South Ockendon Centre (Wendy Curtis)	Ensure that Highways, Public Transport provide enough roads and buses, trains.	Comments noted. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Essex County Council, Highways England, Network Rail, Transport for London and other transport service and infrastructure providers. This work will need to consider the impact of development on both the national and local transport networks serving the Borough.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate
LPIO_434	South Ockendon Centre (Wendy Curtis)	Lakeside Bluewater More Leisure facilities	Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region over the Local Plan period to 2036. This	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound

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			<p>evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace. As part of the process of preparing the new Local Plan the Council will need to review the current policy approach for Lakeside and to update the quantitative projections for future retail and convenience shopping needs set out in the adopted Core Strategy. The Council has also prepared the Lakeside Development Framework and the Lakeside Transport Strategy to help inform the preparation of an Inset Plan to manage the future development of the area. Both studies are available to view on the Councils Local Plan website. The Council will engage proactively with neighbouring local authorities through the Duty to Cooperate process to ensure the proper management and development of a competitive and viable network of centres across the Thames Gateway and East London.</p>	<p>plan and to meet the Councils obligations under the Duty to Cooperate.</p>
LPIO_272	<p>Southend Borough Council (Matthew Thomas)</p>	<p>Southend Borough Council welcomes the invitation to provide comment on the future of the Lakeside Basin. It is essential that any policy approach provides for development at Lakeside Basin which is appropriate in scale and nature to support its transition to a regional centre, but ensures that it does not compromise the position of established regional centres such as Southend and impair their ability to achieve regeneration, renaissance and inward investment. Southend Borough</p>	<p>Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region including Thurrock over the Local Plan period to 2036. This evidence</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of</p>



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		<p>Council notes that in a previous reviews of Lakeside Basin at the retail floorspace expansion was limited to 50,000 m Southend Borough Council, however, it still concerned about the potential impact on the regeneration of Southend Town Centre and central area of the expansion of Lakeside Basin. It would be imperative, therefore, that any new policy approach is supported by a sound and robust evidence base which demonstrates that this new centre will not have a detrimental effect on the ability of an established regional centre such as Southend to achieve their policy objectives as set out national and local policy. Any new policy for Lakeside Basin should recognises that any proposals for the future growth at Lakeside Basin should safeguard the vitality and viability of existing town centres within the catchment of any proposed development, including relevant town centres and the need for any mitigation. This would imply a need for rigorous research and a comprehensive evidence base to investigate the potential effects and impacts of retail development on the immediate and wider area.</p>	<p>will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace.</p>	<p>individual sites for development.</p>

Response to Question 16

Comment ID	Consultee Details	Response to question 16 - What improvements would you like to see in those centres that you visit regularly and what would make you visit them more often?	Officer Response	Officer Action Points
LPIO_478	Anthony Newell	Lakeside Shopping Centre and Retail Park. Why is there no direct access from the A13 west bound? there is when travelling east on the A1	Comments noted.	The Council will take this issue up with Intu Lakeside and seek an appropriate response to the matters raised in this representation.
LPIO_507	Daphne Revell	At Lakeside would like to see more & better equipped rest areas (like at Bluewater) not just benches here and there. Also new flooring throughout the effect on just half an hour in the place is very sore feet and tiredness.	Comments noted. The Council recognises the importance of achieving the sustainable development of the Borough and ensuring that the sites allocated in the Local Plan are deliverable. The Local Plan CIL and Viability Study will inform the plan-making process and advise on the matters raised by the respondent.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_324	Ellandi LLP (Mark Robinson) Via Savills (Chris Moore)	Ellandi fully endorse a strategy which seeks to focus development within Grays Town Centre and support the future allocation of suitable sites for main town centre uses and residential development within the Local Plan. The approach to town centre development is set out by the NPPF at paragraph 23 where it is stated that Local Planning Authorities should promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres. The NPPF defines suitable main town centre uses as retail, leisure, entertainment facilities, which includes restaurants and bars, and offices. Therefore, retail forms only one part of the experience for visitors to a town centre; it is equally about gaining access to people driven services, eating out, meeting with friends and having an opportunity to socialise. The ability to undertake a balanced consideration of complementary town centre uses at the time they are proposed, where this does not undermine the predominance of A1 retail, is the preferred approach of the NPPF to securing the vitality and viability of town centres. Policies for the management of uses in the Primary Shopping Area and Secondary and Primary Shopping Frontages should reflect this flexible approach and not be overly prescriptive. The NPPF also attaches significant weight to supporting economic growth through the planning system, noting that investment should not be overburdened by the combined requirements of planning policy expectations and that centres should be resilient to anticipated future economic changes. The ability to	Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region including Thurrock over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace.	Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region including Thurrock over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace. Action The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of

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		<p>undertake a balanced consideration of complementary town centre uses at the time they are proposed, where this does not undermine the predominance of A1 retail, is the preferred approach of the NPPF to securing the vitality and viability of town centres. Bullet 3 of NPPF Paragraph 23 requires Local Plan policy to: define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations. To accord with national policy, the Local Plan should include a plan for each of the designated centres that clearly identifies primary and secondary shopping frontages. A number of recent local plans have failed to grapple sufficiently with this issue causing delays to their adoption. Policy should not be overly prescriptive in terms of setting a specific percentage or number of contiguous non-A1 uses that are permissible. Rather it should look to place the onus on the Applicant to demonstrate how a non-A1 use would secure the vitality and viability of the primary shopping area as a whole and, if the proposal is within the primary shopping frontage, whether the proposal would undermine the overall predominance of A1 retailing. The above policy approach will allow centres the flexibility to respond to changing consumer demands and meet the improvements in offer that the public may seek over the lifetime of the plan.</p>		<p>individual sites for development.</p>
LPIO_48	<p>Industrial Chemicals Ltd Via Lawson Planning Partnership Ltd (Aarti O'Leary)</p>	<p>No observations at this stage.</p>	<p>Comments noted.</p>	<p>No further action</p>
LPIO_77	<p>Intu Lakeside Ltd (Marc Myers) Via Nathaniel Lichfield &amp; Partners (Stephanie Walker)</p>	<p>The improvements we would like to bring about at intu Lakeside will directly address the challenges outlined above (in question 15) and will include a wider mix of uses including leisure and food and beverage uses and creating a greater sense of place in the Lakeside Basin to make it an even more attractive place to visit.</p>	<p>Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.</p>

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			<p>centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace. As part of the process of preparing the new Local Plan the Council will need to review the current policy approach for Lakeside and to update the quantitative projections for future retail and convenience shopping needs set out in the adopted Core Strategy. The Council has also prepared the Lakeside Development Framework and the Lakeside Transport Strategy to help inform the preparation of an Inset Plan to manage the future development of the area. Both studies are available to view on the Councils Local Plan website. The Council will engage proactively with neighbouring local authorities through the Duty to Cooperate process to ensure the proper management and development of a competitive and viable network of centres across the Thames Gateway and East London.</p>	

Responses to Question 17

Comment ID	Consultee Details	Response to question 17 - What are the best locations for new retail and leisure development in the Borough and how can future development be harnessed to support the delivery of wider regeneration and economic growth needs and objectives?	Officer Response	Officer Action Points
LPIO_508	Daphne Revell	Grays town centre & Purfleet would benefit greatly from more small retail shops being available.	Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region including Thurrock over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_325	Ellandi LLP (Mark Robinson) Via Savills (Chris Moore)	Once the retail evidence base has been updated, any capacity for new convenience or comparison goods floorspace identified within the authority should respect the settlement hierarchy for Thurrock with Grays being the focus for substantial Town Centre improvements. Lower order centres should consolidate their role in the hierarchy by providing local convenience and niche comparison goods floorspace only. In addition to the above, we would stress the importance of complying with National planning policy which seeks to promote retail development in town centre locations first and at a scale appropriate to the role of settlements within a defined hierarchy. Paragraph 23 of the NPPF states that planning policies should be positive, promote competitive town centres (our emphasis) environments and set out policies for the management and growth of centres over the plan period. NPPF paragraph 24 continues to state that Local Planning Authorities should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre. The Local Plan is the opportunity for objectively assessed development requirements to be spatially planned, which includes	Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace. As part of the process of preparing the new Local Plan the Council will need to review the current policy approach for Lakeside and to update the quantitative projections for future retail and convenience shopping needs set out in the adopted Core	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.

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		<p>identifying appropriate growth for different centres. This must be undertaken with full consideration of the role of each centre within the retail hierarchy, the market implications of diverting retail growth to alternative centres and the infrastructure requirements that would be required. Without doing this then the plan cannot be effective. To facilitate this, and to effectively focus redevelopment opportunities on a town centre first basis we would advocate the adoption of an overarching vision or strategy for Grays Town Centre. We acknowledge the ongoing preparation of the Grays Town Centre Regeneration Vision. This was proposed in response to the Adopted Core Strategy which provided for significant growth in housing and employment in the Grays urban area, much of it close to Grays Town Centre, and for growth in retail floorspace within the Town Centre. It is important that this vision is translated into the Local Plan. There are a number of substantial opportunities at Grays Shopping Centre which should be recognised within the new Local Plan. On this basis Ellandi and Savills would welcome the opportunity to meet and discuss these with Thurrock Council.</p>	<p>Strategy. The Council has also prepared the Lakeside Development Framework and the Lakeside Transport Strategy to help inform the preparation of an Inset Plan to manage the future development of the area. Both studies are available to view on the Councils Local Plan website. The Council will engage proactively with neighbouring local authorities through the Duty to Cooperate process to ensure the proper management and development of a competitive and viable network of centres across the Thames Gateway and East London.</p>	
LPIO_255	Gravesham Borough Council (Wendy Lane)	<p>This response is a more general one on retailing and leisure (Q15, 17 + 18) Policy ETG2 of the East of England Regional Strategy, as amended by the Thurrock Lakeside Single Issue Review, defined the northern part of the Lakeside Basin as a Regional Centre. It set out various measures to be pursued through Local Development Documents (LDD) to secure the transformation of the northern part of the Lakeside Basin as a town centre. The Thurrock Core Strategy Policy CSTP7 refines the regional policy by providing an indication of the quantum of development of housing, retail and employment floorspace that will take place at Lakeside, and the type and levels of new development to be provided in Grays. In November 2010 during the course of the LPCS examination, Thurrock made the decision not to produce an AAP for Lakeside, but instead to include a Lakeside specific chapter in the Site Specific Allocations Development Plan Document with delivery and implementation matters set out in a Lakeside Delivery and Implementation SPD. Gravesham BC notes that it was intended that the identification of the boundaries of the Regional Centre would more appropriately also be dealt with in the Specific Site Allocations DPD. As explained in this consultation, in February 2014 the Council decided to</p>	<p>Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region including Thurrock over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace.</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>



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		<p>commence work on a new Local Plan for Thurrock rather than continue with these other documents. Gravesham BC made representations on the Thurrock Lakeside Single Issue Review in 2009 and supports in principle the policy decision that came from that which has been embedded into the current Thurrock Core Strategy. However, as the Thurrock Issues and Options report highlights in para 44, since the adoption of the Core Strategy in 2011, the retail landscape has changed dramatically with far reaching implications for the demand for retail and leisure development both across the UK and within Thurrock. Therefore, new evidence is needed to fully understand Lakeside in its regional context and the potential impact of policy options for new retail and leisure development, on other centres in Thurrock and wider.</p>		
LPIO_99	Hammersons PC Via RPS Group (Paul Alderidge)	<p>The emerging policy framework needs to recognise and support the existing range of retail facilities located at Lakeside. Lakeside includes a number of retail parks including the Thurrock Shopping Park located around the regional shopping centre which are recognised by Core Strategy policy CSTP7 as an existing retail destination that is planned to evolve into a new town centre. Lakeside provides an important role in relation to meeting the higher order comparison goods shopping needs of the Borough and neighbouring areas. The current retail facilities provide a significant number of local employment opportunities. Careful consideration needs to be given to the extent of any defined town centre boundary at Lakeside and the implications for existing retail floorspace located beyond this boundary. The retail parks should continue to be viewed as a preferred location particularly for large format retailing within the borough subject of course to national retail policy tests being satisfied. Policy should continue to be supportive of the management of these retail parks by allowing existing retail premises to adapt to the needs of existing and future retail operators and respond to both operational and logistical requirements etc. Policy should also support the introduction of a mix of retail, leisure and other main town uses as appropriate and needs to have regard to the practicalities and investment implications.</p>	<p>Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace. As part of the process of preparing the new Local Plan the Council will need to review the current policy approach for Lakeside and to update the quantitative projections for future retail and convenience shopping needs set out in the adopted Core Strategy. The Council has also prepared the Lakeside Development Framework and the Lakeside Transport Strategy to help inform the</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.</p>

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			preparation of an Inset Plan to manage the future development of the area. Both studies are available to view on the Councils Local Plan website. The Council will engage proactively with neighbouring local authorities through the Duty to Cooperate process to ensure the proper management and development of a competitive and viable network of centres across the Thames Gateway and East London.	
LPIO_49	Industrial Chemicals Ltd Via Lawson Planning Partnership Ltd (Aarti O'Leary)	No observations at this stage.	Comments noted.	No further action
LPIO_78	Intu Lakeside Ltd (Marc Myers) Via Nathaniel Lichfield & Partners (Stephanie Walker)	Intu Lakeside is the best location for new retail and leisure development in the Borough for comparison retailing and leisure development it is already a very well established and successful shopping centre served by excellent transport infrastructure. It is a focal point for the local communities it serves and has room to grow and change to meet the challenges it faces. Policy CSTP7 Network of Centres, identifies Lakeside as a new emerging Regional Centre, at the top of the retail hierarchy within the borough. Intu Lakeside is the most appropriate location within the Lakeside Basin to focus the Primary Shopping Area. The NPPF (Annex 2) defines the Primary Shopping Area (PSA) as a defined area where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage). Intu Lakeside already performs many of the roles of the core of the town centre. It is already the heart for high street uses, the focus for the main shopping area and contains other complementary uses. Intu lakeside is also the most sustainable location within the Lakeside Basin by virtue of its public transport provision, being sited next to Chafford Hundred Station and the existing bus station. This position is set to be further enhanced through further planned	Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace. As part of the process of preparing the new Local Plan the Council will need to review the current policy approach for Lakeside and to update the quantitative projections for future retail and	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.

Comment ID	Consultee Details	Response to question 17 - What are the best locations for new retail and leisure development in the Borough and how can future development be harnessed to support the delivery of wider regeneration and economic growth needs and objectives?	Officer Response	Officer Action Points
		investment in infrastructure by the new transport interchange approved under the northern extension.	convenience shopping needs set out in the adopted Core Strategy. The Council has also prepared the Lakeside Development Framework and the Lakeside Transport Strategy to help inform the preparation of an Inset Plan to manage the future development of the area. Both studies are available to view on the Councils Local Plan website. The Council will engage proactively with neighbouring local authorities through the Duty to Cooperate process to ensure the proper management and development of a competitive and viable network of centres across the Thames Gateway and East London.	
LPIO_401	London Borough of Barking and Dagenham (Naomi Pomfret)	Whilst the Stage 1 Issues and Options consultation material does not contain detail on policy options, it is understood from Thurrock's representation on LBBDs own Issues and Options consultation that the Council is progressing its proposal to transform Lakeside into a regional Town centre. We wish to engage with Thurrock on this strategic matter and look forward to seeing the further detail at the Stage 2 Issues and Options Consultation.	Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace. As part of the process of preparing the new Local Plan the Council will need to review the current policy approach for Lakeside and to update the quantitative projections for future retail and	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.

Comment ID	Consultee Details	Response to question 17 - What are the best locations for new retail and leisure development in the Borough and how can future development be harnessed to support the delivery of wider regeneration and economic growth needs and objectives?	Officer Response	Officer Action Points
			<p>convenience shopping needs set out in the adopted Core Strategy. The Council has also prepared the Lakeside Development Framework and the Lakeside Transport Strategy to help inform the preparation of an Inset Plan to manage the future development of the area. Both studies are available to view on the Councils Local Plan website. The Council will engage proactively with neighbouring local authorities through the Duty to Cooperate process to ensure the proper management and development of a competitive and viable network of centres across the Thames Gateway and East London.</p>	
LPIO_435	South Ockendon Centre (Wendy Curtis)	Uncertain	Comments noted.	No further action

Responses to Question 18

Comment ID	Consultee Details	Response to question 18 - Is there a need for the development of retail, leisure and other town centres uses in locations outside the existing established retail centres and if so where?	Officer Response	Officer Action Points
LPIO_479	Anthony Newell	I think we have sufficient with Lakeside. Bluewater just across the Thames and Westfield is easily accessible by train.	Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region including Thurrock over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_509	Daphne Revell	East Tilbury would benefit greatly if it had more shopping facilities available.	Comments noted. The Council is committed to working with landowners, developers and the retail industry to improve the range of shopping facilities available to all residents of the Borough. The Local Plan will identify the scale, nature and distribution of new shopping facilities and set out a strategy for the regeneration of the Boroughs older town and local shopping centres.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_143	Dartford Borough Council (Michael Clarkson)	Dartford has recently consulted on the Development Policies Plan: Pre-Submission Draft. This Plan contains detailed policies in support of the adopted Core Strategy approach to strategic matters. We produced a supporting retail paper outlining the current approach to Bluewater alongside the Plan. Dartford has also produced a Local Plan Policy Bulletin to clarify the status of its Local Plan documents and reiterating the commitment to commence a review of the Local Plan as a whole in the latter part of 2016, which was also outlined in the Councils Latest Local Development Scheme.	Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region including Thurrock over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

Comment ID	Consultee Details	Response to question 18 - Is there a need for the development of retail, leisure and other town centres uses in locations outside the existing established retail centres and if so where?	Officer Response	Officer Action Points
			South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace.	
LPIO_326	Ellandi LLP (Mark Robinson) Via Savills (Chris Moore)	<p>The Council should develop policy that supports and enhances the vitality and viability of defined centres within Thurrock. Accordingly, these should be the preferred location for retail (food and non-food), office, leisure and cultural facilities. Any alternative to this approach which gives out of centre sites greater status in the hierarchy to increase their sequential preference is contrary to the principles of the NPPF and could not only harm Grays Town Centre but also the vitality and viability of Thurrock's network of centres. It is noted that incremental improvements to retail at the Lakeside Basin have already impacted significantly upon the health of Grays Town Centre. The introduction of further new or enhanced out of centre retail floorspace would see market share deteriorate further. In order to accord with the provisions of the NPPF the Council should:</p> <ul style="list-style-type: none"> <li>i. set out a Town Centre first approach for the location of town centre uses across Thurrock;</li> <li>ii. set out a hierarchy of retail centres, comprising town, district and local retail centres;</li> <li>iii. define town centre boundaries, primary shopping areas and secondary shopping streets where applicable;</li> <li>iv. set out policy to resist further significant out of town retail development in order to support bringing forward retail led regeneration within Grays Town Centre;</li> <li>v. set a floor space threshold for when an Impact Assessment is required for edge of and out of centre retail and leisure proposals, reflecting the roles of different centres; and</li> <li>vi. seek to ensure that the role of Grays Town centre as a retail destination is enhanced by directing retail, leisure, tourism and cultural development to the town centre, enabling it to offer a vibrant, vital and distinctive experience. With respect to the town centres first approach, it is noted that the anticipated timing of any substantial residential growth in Thurrock will influence the phasing for when and where the Local Plan seeks to deliver plan led retail need and the preferred strategy for doing this. These considerations will in turn influence how the sequential and impact tests within the NPPF are interpreted and drafted within the new Local Plan. The NPPF requires plan led need to be met in full and therefore the Local Plan must grapple with how to do this in the most sustainable manner that supports the overall vision for Thurrock. It should be noted that quantitative</li> </ul>	<p>Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region including Thurrock over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace.</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>



Comment ID	Consultee Details	Response to question 18 - Is there a need for the development of retail, leisure and other town centres uses in locations outside the existing established retail centres and if so where?	Officer Response	Officer Action Points
		<p>retail need, whilst an important factor, forms only part of the Councils approach to defining a retail strategy a Page 9 for the authority. This is because, as clearly stated in the PPG (Paragraph: 003 Reference ID: 2a-003-20140306) the need for all land uses should address both the [...] quantity of economic development floorspace needed based on quantitative assessments, but also on an understanding of the qualitative requirements of each market segment. This means that whilst there is an onus on local authorities to understand from a purely quantitative stand point the amount of expenditure capacity that exists across the Plan period (which could potentially be converted into a floorspace requirement), this must be set against a consideration of the qualitative issues and what meeting that need in full might do to the more important town centre first approach. For example, expenditure calculations may suggest a level of capacity over the Plan period that would require a significant amount of out of centre floorspace to be delivered across the retail hierarchy. However, following a review the qualitative offer of the hierarchy, it may become apparent that a certain market segment (e.g. clothes and footwear) is already well catered for and in fact there is no need to deliver the level of floorspace identified by the quantitative assessment. Or alternatively, there are a high number of vacancies in a certain centre that need to be addressed before expansion is considered. This would in turn inform a decision to reduce the amount of retail floorspace that is required to be delivered over the Plan period and instead allow authorities to focus on producing effective town centre strategies which seek to address qualitative deficiencies within their areas including tackling addressing vacancies, improving public realm, encouraging new entrants, site assembly for in-centre redevelopment and implementing a place marketing strategy to entice more visitors. Successfully delivering a town centre first approach will require policies for development management that are adapted to reflect and support local circumstances. The new Local Plan should not simply cut and paste the sequential and impact tests from the NPPF but instead consider when and where need / capacity is likely to arise. This is to avoid the unintended consequences of an applicant seeking to deliver all of the floorspace at the start of the Plan period without supporting retail expenditure being available. It would be beneficial to define what the Council considers to be the appropriate scale and form of development for each of the town and local centres within Thurrock. This</p>		

Comment ID	Consultee Details	Response to question 18 - Is there a need for the development of retail, leisure and other town centres uses in locations outside the existing established retail centres and if so where?	Officer Response	Officer Action Points
		<p>will need to be determined by updated retail assessment work to identify any existing gaps in provision for each of the centres and therefore the scale and type of retailing required to support a sustainable future for the centres. The provision would also then allow capacity figures as informed by qualitative assessment to be set that are relevant to each centre and in turn the phasing requirements for delivering that capacity. The phasing of capacity will be strongly influenced by housing growth and the location of this growth, therefore policy should ensure that new retailing is generally phased in line with housing growth. This should not restrict town centre sites, as allocated in the Local Plan, from coming forward in advance of plan led capacity being available. In addition, the Council should undertake an assessment of thresholds to identify a locally set threshold or thresholds over which impact assessment will be required for main town centre uses (office, leisure, retail etc.). The NPPF threshold of 2,500 sq. m is too high, particularly in areas where town centres are vulnerable and even a small out of centre scheme could have a disproportionate effect on the vitality and viability of the centre. Our experience of the NPPF threshold is that developers of out of centre proposals increasingly size a scheme just under the NPPF threshold on the basis of there not being a unit available within a town centre location that meets all of the operational requirements of an occupier. This then allows them to circumvent the requirement to assess the proposals against the impact test - the NPPF is clear that this is only required over the nationally set threshold or where a locally set threshold, based on robust evidence, is set. We would therefore strongly recommend that research led by Thurrock Council is undertaken to assess where the current balance of unit sizes lies in each of the Boroughs town, district and local centres. A suitable threshold or thresholds can then be set which supports the spatial strategy for the Plan. In summary, this question cannot be answered without the updated evidence that the Council needs to produce to evidence quantitative and qualitative need for town centre uses.</p>		
LPIO_219	Essex County Council (Lesley Stenhouse)	The potential diversification of uses at Lakeside and the promotion of uses other than retail to drive up footfall should be considered.	Comments welcomed. The Council will ensure that Essex County Council engaged in the development of the Local Plan evidence base. In doing so the Council would welcome further discussion with the County	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin

Comment ID	Consultee Details	Response to question 18 - Is there a need for the development of retail, leisure and other town centres uses in locations outside the existing established retail centres and if so where?	Officer Response	Officer Action Points
			Council on the nature of the evidence base required and the opportunities for the joint - commissioning of technical work across Thurrock and South Essex.	the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_536	George Watts	A lot of work needs to be done on protecting our town and village shopping area. We could invest in making them more attractive places to visit and shop, landscaping, painting and small repairs do not cost the earth. Car parking fees should be reduced or even abolished. There should be a bias against larger out of town types stores. Leisure facilities provision is an area where the local authority has failed to recognise the importance of a healthy population bought about by participation in sports and leisure activities and consequently has invested relatively little. Why one might ask did the Victorians factory owners provide sports fields and other facilities for their employees easy it was to reduce absenteeism, keep their workers fit and create a family friendly cohesion among their workforce. Watching sport can also bring about camaraderie and closer community where is the leadership to assist our major sports teams in acquiring their own grounds so they can run schemes that allow more of our young people to develop full potential? The shortening of opening hours for libraries is a disaster for the advancement of reading of our young people and why was the old Ritz cinema building not garbage as a replacement theatre of the Thameside and the original building turned into an Art Gallery and Conference Centre in partnership with college? What a money spinner chance lost. We should ensure education, health and community facilities are right for Thurrock people not a Minister sitting in offices in London. The three areas of population that make up Thurrock should be looked at individually to identify any areas of special needs that might be required to being them into the modern world. The shocking treatment of the local fire brigade needs recognising and rectified.	Comments noted. The Council is committed to working with landowners, developers and the retail industry to improve the range of shopping facilities available to all residents of the Borough. The Local Plan will identify the scale, nature and distribution of new shopping facilities and set out a strategy for the regeneration of the Boroughs older town and local shopping centres. The Council is preparing a new Active Place Strategy which will identify proposals to improve the nature, quality and provision of leisure and recreational facilities across the whole of Thurrock. The Strategy which is being prepared jointly with Sport England will also identify priorities for funding and will help inform the preparation of the Local Plan including policies to protect open space, including football pitches, from development and to obtain additional funding from developers to maintain and enhance both new and existing leisure opportunities.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_256	Gravesham Borough Council (Wendy Lane)	This response is a more general one on retailing and leisure (Q15, 17 + 18) Policy ETG2 of the East of England Regional Strategy, as amended by the Thurrock Lakeside Single Issue Review, defined the northern part of the Lakeside Basin as a Regional Centre. It set out various measures to be pursued through Local Development Documents (LDD) to secure the transformation of the northern part of the Lakeside Basin as a town centre. The	Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region over the Local Plan period to 2036. This	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound

Comment ID	Consultee Details	Response to question 18 - Is there a need for the development of retail, leisure and other town centres uses in locations outside the existing established retail centres and if so where?	Officer Response	Officer Action Points
		<p>Thurrock Core Strategy Policy CSTP7 refines the regional policy by providing an indication of the quantum of development of housing, retail and employment floorspace that will take place at Lakeside, and the type and levels of new development to be provided in Grays. In November 2010 during the course of the LPCS examination, Thurrock made the decision not to produce an AAP for Lakeside, but instead to include a Lakeside specific chapter in the Site Specific Allocations Development Plan Document with delivery and implementation matters set out in a Lakeside Delivery and Implementation SPD. Gravesham BC notes that it was intended that the identification of the boundaries of the Regional Centre would more appropriately also be dealt with in the Specific Site Allocations DPD. As explained in this consultation, in February 2014 the Council decided to commence work on a new Local Plan for Thurrock rather than continue with these other documents. Gravesham BC made representations on the Thurrock Lakeside Single Issue Review in 2009 and supports in principle the policy decision that came from that which has been embedded into the current Thurrock Core Strategy. However, as the Thurrock Issues and Options report highlights in para 44, since the adoption of the Core Strategy in 2011, the retail landscape has changed dramatically with far reaching implications for the demand for retail and leisure development both across the UK and within Thurrock. Therefore, new evidence is needed to fully understand Lakeside in its regional context and the potential impact of policy options for new retail and leisure development, on other centres in Thurrock and wider.</p>	<p>evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace. As part of the process of preparing the new Local Plan the Council will need to review the current policy approach for Lakeside and to update the quantitative projections for future retail and convenience shopping needs set out in the adopted Core Strategy. The Council has also prepared the Lakeside Development Framework and the Lakeside Transport Strategy to help inform the preparation of an Inset Plan to manage the future development of the area. Both studies are available to view on the Councils Local Plan website. The Council will engage proactively with neighbouring local authorities through the Duty to Cooperate process to ensure the proper management and development of a competitive and viable network of centres across the Thames Gateway and East London.</p>	<p>plan and to meet the Councils obligations under the Duty to Cooperate.</p>
LPIO_416	Greater London Authority (Jorn Peters)	<p>Significant further development of Lakeside and/or any significant new retail/leisure development should consider the relationship with London's Town Centre Network and any potential impacts on town centre retail/leisure provision within London.</p>	<p>Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region over the Local Plan period to 2036. This evidence will be used to inform</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils</p>

Comment ID	Consultee Details	Response to question 18 - Is there a need for the development of retail, leisure and other town centres uses in locations outside the existing established retail centres and if so where?	Officer Response	Officer Action Points
			<p>the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace. As part of the process of preparing the new Local Plan the Council will need to review the current policy approach for Lakeside and to update the quantitative projections for future retail and convenience shopping needs set out in the adopted Core Strategy. The Council has also prepared the Lakeside Development Framework and the Lakeside Transport Strategy to help inform the preparation of an Inset Plan to manage the future development of the area. Both studies are available to view on the Councils Local Plan website. The Council will engage proactively with neighbouring local authorities through the Duty to Cooperate process to ensure the proper management and development of a competitive and viable network of centres across the Thames Gateway and East London.</p>	<p>obligations under the Duty to Cooperate.</p>
LPIO_100	Hammersons PC Via RPS Group (Paul Alderidge)	<p>The current development plan identifies the creation of a new town centre at Lakeside focused around the regional shopping centre. This is supported. The Retail Study referred to in our answer to Question 1 should establish whether there is a need for additional retail floorspace within the Borough and the broad locations to meet any need. Such studies are however unlikely capture the full needs of existing retailers wishing to expand or adapt existing retail premises or relocate. In this respect, it is important that the Local Plan establishes a flexible retail</p>	<p>Support Welcomed. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region including Thurrock over the Local Plan period to 2036. This evidence will be used to inform</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for</p>



<b>Comment ID</b>	<b>Consultee Details</b>	<b>Response to question 18 - Is there a need for the development of retail, leisure and other town centres uses in locations outside the existing established retail centres and if so where?</b>	<b>Officer Response</b>	<b>Officer Action Points</b>
		policy framework which is supportive of proposals which seek to manage existing retail floorspace in retail parks at Lakeside. It is important that existing retail floorspace is retained in full and beneficial economic use. The past 5-8 years have demonstrated the importance of the need for flexibility to enable retailers to adapt to prevailing market conditions.	the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace.	development.
LPIO_50	Industrial Chemicals Ltd Via Lawson Planning Partnership Ltd (Aarti O'Leary)	No observations at this stage.	Comments noted.	No further action
LPIO_79	Intu Lakeside Ltd (Marc Myers) Via Nathaniel Lichfield & Partners (Stephanie Walker)	Existing centres including intu Lakeside can provide for the future needs of Thurrock. Further development outside these centres is not required and identified needs should be focussed on maintaining and enhancing existing centres. One exception that might be acceptable is small scale retail associated with new residential development designed to meet local needs.	Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region including Thurrock over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_339	Miller Strategic Land Via MRPP (Richard Robeson)	Whilst government policy continues to emphasise the importance of a 'town centre first' approach to retail and related development, there must continue to be recognition that some retailers require out of centre locations by virtue of the products and format involved. Also, notwithstanding the existing network of centres in Thurrock, there may be locations and opportunities for new retail and related services to provide for specific, locational needs (e.g., transport infrastructure) which in turn improves sustainability. Also, where significant housing and employment development is proposed, allocations and proposals ought to include facilities which serve immediate needs, again to enhance sustainability.	Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region including Thurrock over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.



Comment ID	Consultee Details	Response to question 18 - Is there a need for the development of retail, leisure and other town centres uses in locations outside the existing established retail centres and if so where?	Officer Response	Officer Action Points
		The Council is reminded that retail and other town centre uses need to be met in full and are not compromised by site availability (Paragraph 23 of the NPPF).	network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace.	
LPIO_122	Port of London Authority (Helena Payne)	The need for new homes is a key topic within the consultation documents. Whilst not specifically relevant to the interests of the PLA, I wish to take the opportunity in advising that should any riverside sites come up for mixed use or residential development, policy should consider the need to maximise the use of the river for the transport of materials associated with riverside development, and the removal of waste. In addition, on completion of future development, the use of the river as an alternative, and sustainable, form of passenger transport.	Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region including Thurrock over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_117	Sainsbury's Supermarkets Ltd Via Indigo Planning (Sean McGrath)	Sainsbury's currently has one superstore in Thurrock, located in Grays on Howard Road, RM16 6YJ. Given this, it has a keen interest in the Council's emerging policy and the implications for its existing estate and future aspirations. The existing superstore is designated as a shopping centre and parade in the adopted Core Strategy Proposals Map (2011). The site was also designated as a Neighbourhood Shopping Parade in the superseded Local Plan Proposals Map (1997). Given the site has been designated as a shopping destination, in planning policy terms, for a considerable period of time it is evident that the site is an established retail location. Therefore, its importance should be reflected in the emerging Local Plan through the site's continued allocation as a shopping centre.	Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region including Thurrock over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_436	South Ockendon Centre (Wendy Curtis)	Local Shops are needed with a good variety of goods.	Comments noted. The Council is committed to working with landowners, developers and the retail industry to improve the range of shopping facilities available to all residents of the	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust

Comment ID	Consultee Details	Response to question 18 - Is there a need for the development of retail, leisure and other town centres uses in locations outside the existing established retail centres and if so where?	Officer Response	Officer Action Points
			Borough. The Local Plan will identify the scale, nature and distribution of new shopping facilities and set out a strategy for the regeneration of the Boroughs older town and local shopping centres.	evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_545	Taylor Wimpey East London Via Barton Wilmore (Lauren Dooley)	Purfleet currently lacks any true centre or local facilities. There is an opportunity to create a strong and vibrant centre at the heart of Purfleet around the station with new retail, community, education and employment uses. New housing in and around Purfleet would support this new centre.	Comments noted. The Council is committed to working with landowners, developers and the retail industry to improve the range of shopping facilities available to all residents of the Borough. The Local Plan will identify the scale, nature and distribution of new shopping facilities and set out a strategy for the regeneration of the Boroughs older town and local shopping centres.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.

Responses to Question 19

Comment ID	Consultee Details	Response to question 19 - what new sport and leisure facilities do think are needed in the Borough to support existing and new communities?	Officer Response	Officer Action Points
LPIO_510	Daphne Revell	A swimming pool & recreation ground at East Tilbury to serve the local community would also attract people /children from Tilbury, Orsett & Bulphan areas etc. be good for shops too.	Comments noted. The Council is preparing a new Active Place Strategy which will identify proposals to improve the nature, quality and provision of leisure and recreational facilities across the whole of Thurrock. The Strategy which is being prepared jointly with Sport England will also identify priorities for funding and will help inform the preparation of the Local Plan including policies to protect open space, including football pitches, from development and to obtain additional funding from developers to maintain and enhance both new and existing leisure opportunities.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_156	Essex Bridleways Association (Sue Dobson)	Further off-road multi-user access for informal recreation - these can be designed in to new developments and be integrated with the existing rights of way network	Comments noted. The Council is preparing a new Active Place Strategy which will identify proposals to improve the nature, quality and provision of leisure and recreational facilities across the whole of Thurrock. The Strategy which is being prepared jointly with Sport England will also identify priorities for funding and will help inform the preparation of the Local Plan including policies to protect open space, including football pitches, from development and to obtain additional funding from developers to maintain and enhance both new and existing leisure opportunities.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan.
LPIO_220	Essex County Council (Lesley Stenhouse)	ECC as a neighbouring statutory authority and service provider will continue to work with Thurrock Council on cross boundary issues regarding current provision and future requirements for social Infrastructure including schools and health provision. ECC recommend that the	Comments noted. The Council will ensure that Essex County Council engaged in the development of the Local Plan evidence base. In doing so the	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the

Comment ID	Consultee Details	Response to question 19 - what new sport and leisure facilities do think are needed in the Borough to support existing and new communities?	Officer Response	Officer Action Points
		emerging Local Plan is supported by further investigation and evidence concerning the provision, commitment and timing of social infrastructure, to support the viability and deliverability of the Local Plan, and to determine any cross boundary impacts.	Council would welcome further discussion with the County Council on the nature of the evidence base required and the opportunities for the joint - commissioning of technical work across Thurrock and South Essex.	development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_51	Industrial Chemicals Ltd Via Lawson Planning Partnership Ltd (Aarti O'Leary)	Any existing/ new sport and recreational facilities need to be located in suitable locations and should not reduce the supply of land which is more suitable for meeting employment and housing needs. With this in mind, it is requested that the redundant former private sports ground adjoining ICLs West Thurrock Works, Stoneness Road, and the redundant former private sports ground at Hillside, London Road, Grays, are de-allocated as Existing Open Spaces and identified for employment and housing purposes respectively please see LPPs accompanying Statement.	Comments noted. The Council is preparing a new Active Place Strategy which will identify proposals to improve the nature, quality and provision of leisure and recreational facilities across the whole of Thurrock. The Strategy which is being prepared jointly with Sport England will also identify priorities for funding and will help inform the preparation of the Local Plan including policies to protect open space, including football pitches, from development and to obtain additional funding from developers to maintain and enhance both new and existing leisure opportunities.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_183	Local Access Forum (Sue Dobson)	With reference to further sport and leisure facilities required, we would prefer to see further off-road multi-user access for informal recreation; these tracks can be designed in to new developments and integrated with the existing rights of way network.	Comments noted. The Council is preparing a new Active Place Strategy which will identify proposals to improve the nature, quality and provision of leisure and recreational facilities across the whole of Thurrock. The Strategy which is being prepared jointly with Sport England will also identify priorities for funding and will help inform the preparation of the Local Plan including policies to protect open space, including football pitches, from development and to obtain additional funding from developers to maintain and enhance both new and existing	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan.

<b>Comment ID</b>	<b>Consultee Details</b>	<b>Response to question 19 - what new sport and leisure facilities do think are needed in the Borough to support existing and new communities?</b>	<b>Officer Response</b>	<b>Officer Action Points</b>
			leisure opportunities.	
LPIO_340	Miller Strategic Land Via MRPP (Richard Robeson)	Proposals for new facilities must be closely tied to an assessment of existing infrastructure. Care should also be taken to ensure new proposals are wholly necessary and deliverable. It is often the case that consolidation or better use of existing facilities can fill gaps in provision. New housing proposals should ensure residents are placed within reasonable distance of facilities (whether wholly new or improving existing facilities). The Council must also recognise the additional benefits outdoor leisure provision has for ecology and the local environment.	Comments noted. The Council is preparing a new Active Place Strategy which will identify proposals to improve the nature, quality and provision of leisure and recreational facilities across the whole of Thurrock. The Strategy which is being prepared jointly with Sport England will also identify priorities for funding and will help inform the preparation of the Local Plan including policies to protect open space, including football pitches, from development and to obtain additional funding from developers to maintain and enhance both new and existing leisure opportunities.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_388	Natural England (Jamie Melvin)	Natural England is committed to assisting the delivery of the England Coast Path. It would also support any proposals for additional country parks provided that they are appropriately sited (in particular where these are required to mitigate for recreational disturbance or damage impacts to sites designated for their nature conservation value). Please note our comments above on green infrastructure and ANGSt.	Comments noted. The Council is preparing a new Active Place Strategy which will identify proposals to improve the nature, quality and provision of leisure and recreational facilities across the whole of Thurrock. The Strategy which is being prepared jointly with Sport England will also identify priorities for funding and will help inform the preparation of the Local Plan including policies to protect open space, including football pitches, from development and to obtain additional funding from developers to maintain and enhance both new and existing leisure opportunities.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_437	South Ockendon Centre (Wendy Curtis)	No. What plans have been made to ensure that the young people of Thurrock particularly (South Ockendon) have good facilities to pursue sports etc. Not just scouts and Guide groups.	Comments noted. The Council is preparing a new Active Place Strategy which will identify proposals to improve the nature, quality and provision of leisure and recreational	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust

Comment ID	Consultee Details	Response to question 19 - what new sport and leisure facilities do think are needed in the Borough to support existing and new communities?	Officer Response	Officer Action Points
			facilities across the whole of Thurrock. The Strategy which is being prepared jointly with Sport England will also identify priorities for funding and will help inform the preparation of the Local Plan including policies to protect open space, including football pitches, from development and to obtain additional funding from developers to maintain and enhance both new and existing leisure opportunities.	evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_3	Sport England (Roy Warren)	The Council's emerging Active Place Strategy should be used as the basis for informing the new sport and leisure facilities are needed in Thurrock for supporting existing and new communities. The indoor and outdoor sports strategies that will be prepared as part of the Active Place Strategy will be expected to audit and assess existing provision and identify needs and opportunities in accordance with established guidance. This will then provide the evidence base for informing relevant local plan policies and allocations. Sport England will expect the Council to use the evidence base to set out proposals in the plan for protecting, enhancing and providing sport and leisure facilities in response to identified needs. More details of Sport England's Protect, Enhance and Provide aims objectives and our Forward Planning guidance for local authorities is on our website at <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/aims-and-objectives/">http://www.sportengland.org/facilities-planning/planning-for-sport/aims-and-objectives/</a> and <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/">http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</a> . In particular, it would be expected that the emerging local plan would include the following: - policies to protect existing sport/leisure facilities where there is a need to do so to meet existing/future community needs which accord with paragraph 74 of the NPPF - policies that support the principle of enhancing existing sports/leisure facilities to meet community needs e.g. replacement/extended pavilions, refurbished/replacement leisure centres, sports lighting to allow greater community use; - policies and allocations to provide new sports/leisure facilities that are required to meet identified needs e.g. site allocations for new playing fields, requirements in major housing and mixed use developments for sport/leisure provision, sports	Comments noted. The Council is preparing a new Active Place Strategy which will identify proposals to improve the nature, quality and provision of leisure and recreational facilities across the whole of Thurrock. The Strategy which is being prepared jointly with Sport England will also identify priorities for funding and will help inform the preparation of the Local Plan including policies to protect open space, including football pitches, from development and to obtain additional funding from developers to maintain and enhance both new and existing leisure opportunities.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.



Comment ID	Consultee Details	Response to question 19 - what new sport and leisure facilities do think are needed in the Borough to support existing and new communities?	Officer Response	Officer Action Points
		<p>hubs allocations etc. - policies that make adequate provision for new development (especially residential) to provide for the additional sport/leisure facility needs that they generate through CIL and/or planning obligations - policies that do not restrict the principle of new and enhanced outdoor sports facilities (including ancillary facilities) in the Green Belt where they would meet community needs - a design policy which encourages developments to be designed to promote active lifestyles through sport and physical activity (through use of Sport England's and Public Health England's established Active Design guidance (<a href="http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/">http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/</a>) Sport England would be able to provide the Council with further advice on any of the above matters upon request.</p>		
LPIO_458	Vivian Humphry	<p>Another swimming pool would be good. Cleanliness of open spaces also promotes healthy outdoor activities Sometimes it feels like Thurrock is swamped with litter.</p>	<p>Comments noted. The Council is preparing a new Active Place Strategy which will identify proposals to improve the nature, quality and provision of leisure and recreational facilities across the whole of Thurrock. The Strategy which is being prepared jointly with Sport England will also identify priorities for funding and will help inform the preparation of the Local Plan including policies to protect open space, including football pitches, from development and to obtain additional funding from developers to maintain and enhance both new and existing leisure opportunities.</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.</p>

**Responses to Question 20**

<b>Comment ID</b>	<b>Consultee Details</b>	<b>Response to question 20 - National policy gives Councils new powers to protect valued open spaces by designating them as a Local Green Spaces. Are there any open spaces that are special to your local community which should be designated?</b>	<b>Officer Response</b>	<b>Officer Action Points</b>
LPIO_480	Anthony Newell	I assume our wildlife centres i.e. Purfleet, Mucking, Belhus Chafford Gorge Grays Gorges etc. will be protected. these are sites enjoyed by all and provide education for children on wildlife. Daneholes - historic value.	Comments noted. The Local Plan will have a key role to play in providing an appropriate planning policy framework to safeguard and enhance the Boroughs built, natural and historic environment. The Council has commissioned an update of the evidence base to ensure that the Local Plan achieves the objectives through the proper identification of Thurrock's built, natural and historic assets and the management issues associated with each designation and site.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_511	Daphne Revell	Orsett heath area (Heath Road End) & Tyrells heath area (Orsett heath end) L shaped. Has small swings & slide but need more adult gym equipment on site to make better use. Also green space is good to take children there (&dogs) for walks & the park run us very special here too. Also play area at Wyckham Fields & Alinn Close also Woodside Wood & old House Wood areas. Very important to retain leisure green areas in Chadwell St Mary.	Comments noted. The Local Plan will have a key role to play in providing an appropriate planning policy framework to safeguard and enhance the Boroughs built, natural and historic environment. The Council has commissioned an update of the evidence base to ensure that the Local Plan achieves the objectives through the proper identification of Thurrock's built, natural and historic assets and the management issues associated with each designation and site.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_298	Gladman Developments Ltd (Phil Bamford)	Gladman note Q20 and take this opportunity to remind the Council of the tests which need to be met when seeking to designate Local Green Space (LGS). 6.8 Paragraph 77 of the Framework sets out the following in terms of when it is appropriate or not to designate land as a Local Green Space. The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used: Where the green space is in reasonably close proximity to the community it serves; Where the green area is demonstrably special to a local community and holds particular local significance, for	Comments noted. The Local Plan will have a key role to play in providing an appropriate planning policy framework to safeguard and enhance the Boroughs built, natural and historic environment. The Council has commissioned an update of the evidence base to ensure that the Local Plan achieves the objectives through	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

Comment ID	Consultee Details	Response to question 20 - National policy gives Councils new powers to protect valued open spaces by designating them as a Local Green Spaces. Are there any open spaces that are special to your local community which should be designated?	Officer Response	Officer Action Points
		example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and Where the green area concerned is local in character and is not an extensive tract of land. 6.9 The Planning Practice Guidance (PPG) provides further guidance on LGS designations including paragraph ID. 37-015-20140306, There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgement will inevitably be needed. However, paragraph 77 of the National Planning Policy Framework is clear that Local Green Space designations should only be used where the green area concerned is not an extensive tract of land. Consequently, blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a back door way to try to achieve what would amount to a new are of Green Belt by another name.	the proper identification of Thurrock's built, natural and historic assets and the management issues associated with each designation and site.	
LPIO_52	Industrial Chemicals Ltd Via Lawson Planning Partnership Ltd (Aarti O'Leary)	No observations at this stage.	Comments noted.	No further action.
LPIO_459	Vivian Humphry	Yes, our Green Belt to the north east of Corringham, some of the last open countryside with views to and from One Tree Hill country park. Must not be lost to development.	Comments noted. The Local Plan will have a key role to play in providing an appropriate planning policy framework to safeguard and enhance the Boroughs built, natural and historic environment. The Council has commissioned an update of the evidence base to ensure that the Local Plan achieves the objectives through the proper identification of Thurrock's built, natural and historic assets and the management issues associated with each designation and site.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

## Responses to Question 21

Comment ID	Consultee Details	Response to question 21 - What new educational facilities do think are needed in the Borough to support existing and new communities?	Officer Response	Officer Action Points
LPIO_481	Anthony Newell	With increase in population - new schools are needed to give a better Teacher / student ratio. Do we need another 6th Form college? Can Palmers be extended if required?	Comments welcomed. The Council will also work in close partnership with service providers to ensure that future educational needs are aligned and met by the provision of improved service and facilities where it is necessary and appropriate to do.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_512	Daphne Revell	With so many houses proposing to be built perhaps schools may have to be built under proposed blocks of flats & make even better use of Brownfield sites and leisure facilities should be made available for public use out of school hours.	Comments welcomed. The Council will also work in close partnership with service providers to ensure that future educational needs are aligned and met by the provision of improved service and facilities where it is necessary and appropriate to do.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_108	DP World - London Gateway Via Trevor Hutchinson Planning and Transportation Ltd (Trevor Hutchinson)	Sufficient existing physical facilities exist however there is a lack of sufficient /suitable courses in Engineering (civil & electrical), logistics and certain essential IT specialisms.	Comments welcomed. The Council will ensure that the respondent and other stakeholders are fully engaged in the development of the Local Plan evidence base.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_221	Essex County Council (Lesley Stenhouse)	Thurrock Council will need to ensure that plans are in place to ensure that there are sufficient primary and secondary school places available across the borough to meet increasing demands of a growing school age population, particularly on new housing developments. Local authorities have a key role in ensuring there is sufficient high quality childcare provision that is matched to the needs of parents and from September 2013, local authorities have a duty to secure early education for disadvantaged two year olds. It is imperative that with the proposed housing and employment developments, a sufficient amount of Early Years and Childcare provision is maintained from the additional number of childcare places	Comments noted. The Council will ensure that Essex County Council engaged in the development of the Local Plan evidence base. In doing so the Council would welcome further discussion with the County Council on the nature of the evidence base required and the opportunities for the joint - commissioning of technical work across Thurrock and South Essex.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate

Comment ID	Consultee Details	Response to question 21 - What new educational facilities do think are needed in the Borough to support existing and new communities?	Officer Response	Officer Action Points
		that will be generated from these proposals. Additional provision should be considered where these developments will create a shortfall of available places.		
LPIO_53	Industrial Chemicals Ltd Via Lawson Planning Partnership Ltd (Aarti O'Leary)	The need to provide educational facilities to support population growth associated with residential development, is acknowledged. Concerning the redevelopment of the site at Titan Works for housing purposes, there is likely to be a need to either expand Stifford Clays Primary and William Edwards Secondary Schools, or facilitate the new education campus at the Blackshots Site through financial contributions.	Comments noted. The Council will also work in close partnership with service providers to ensure that future educational needs are aligned and met by the provision of improved service and facilities where it is necessary and appropriate to do.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_21	Lawson Planning Partnership Ltd (Jenny Moor)	Our client acknowledges that residential development on the site at Orsett will need to provide for sufficient nursery, primary and secondary school places to support the population growth associated with the development in accordance with Regulation 122 of the Community Infrastructure Regulations (2010, as amended) and paragraph 204 of the NPPF, subject to financial viability considerations.		
LPIO_341	Miller Strategic Land Via MRPP (Richard Robeson)	Whilst the Council, as LEA here, must take the lead in respect of demand for education facilities, an increasing number of schools are falling outside local authority control and thus a further reason why an overarching infrastructure deficit assessment is required as part of the Council's evidence base. The Council should recognise the potential within new significant housing schemes to not only provide for those scheme but to also address underlying capacity issues. Notwithstanding the advent of CIL, a flexible approach may still be required, recognising that 'contributions' to education may arise in a number of forms.	Comments noted. The SE SHMA and the Local Plan CIL and Viability Study will advise on the matters raised by the respondent.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_438	South Ockendon Centre (Wendy Curtis)	More School places for all ages	Comments noted. The Council will also work in close partnership with service providers to ensure that future educational needs are aligned and met by the provision of improved service and facilities where it is necessary and appropriate to do.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_460	Vivian Humphry	I have it on good authority that there are currently enough school places. However, if vast swathes of housing are built obviously this would alter. How schools attract	Comments noted. The Council will also work in close partnership with service	The Council will arrange a meeting with the respondent to discuss their

Comment ID	Consultee Details	Response to question 21 - What new educational facilities do think are needed in the Borough to support existing and new communities?	Officer Response	Officer Action Points
		enough quality teachers subsequently is another matter entirely.	providers to ensure that future educational needs are aligned and met by the provision of improved service and facilities where it is necessary and appropriate to do.	representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.



Responses to Question 22

Comments ID	Consultee Details	Response to question 22 - What new health and community facilities do you think are needed in the Borough to support both new and existing communities?	Officer Response	Officer Action Points
LPIO_482	Anthony Newell	A new hospital - GP surgeries etc. as already stated. Can the community hospital site in Stafford Clays be extended? I was disappointed that the local walk in medical centre in Grays was closed. it gave easy access to people 7 days a week. the present system is only available a few hours at the weekend and can only be accessed via appointment. Defeats the objective. People will now turn up at Basildon A&E which is already overburdened or Ossett minor injuries. The People of Thurrock need their own hospital.	Agree that in meeting development needs adequate infrastructure will be required to support them. The Council is actively engaged with relevant health bodies in addressing need for healthcare facilities.	
LPIO_513	Daphne Revell	longer hours to access existing health facilities & more procedures carried out in improved clinics and doctors Surgeries. And please do not move services away from Basildon & Orsett Hospital - we desperately need allow services provided by these two excellent hospitals.	Comments noted. The Council will undertake a full Health Impact Assessment as a key element of the Integrated Assessment (SA/SEA/HIA/EqIA) being prepared in support of the Local Plan. The Council will also work in close partnership with service providers to ensure that future health and growth needs are aligned and met by the provision of improved service and facilities where it is necessary and appropriate to do.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_54	Industrial Chemicals Ltd Via Lawson Planning Partnership Ltd (Aarti O'Leary)	The need to provide health and community facilities to support population growth associated with residential development, is acknowledged. All developer led healthcare and community facilities provision would need to meet the tests set out in Regulation 122 of the Community Infrastructure Regulations (2010, as amended) and paragraph 204 of the NPPF and be subject to financial viability considerations.	Comments welcomed. The Council will also work in close partnership with service providers to ensure that community assets are safeguarded where it is necessary and appropriate to do so.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_22	Lawson Planning Partnership Ltd (Jenny Moor)	Our client acknowledges that residential development on the site at Orsett will need to provide for sufficient healthcare infrastructure and funding and community facilities to support the population growth associated with the development in accordance with Regulation 122 of the Community Infrastructure Regulations (2010, as amended) and paragraph 204 of the NPPF, subject to financial viability considerations.	Comments noted. The Council will undertake a full Health Impact Assessment as a key element of the Integrated Assessment (SA/SEA/HIA/EqIA) being prepared in support of the Local Plan. The Council will	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound

Comments ID	Consultee Details	Response to question 22 - What new health and community facilities do you think are needed in the Borough to support both new and existing communities?	Officer Response	Officer Action Points
			also work in close partnership with service providers to ensure that future health and growth needs are aligned and met by the provision of improved service and facilities where it is necessary and appropriate to do.	plan and the allocation of individual sites for development.
LPIO_342	Miller Strategic Land Via MRPP (Richard Robeson)	Whilst the Council, as LEA here, must take the lead in respect of demand for education facilities, an increasing number of schools are falling outside local authority control and thus a further reason why an overarching infrastructure deficit assessment is required as part of the Council's evidence base. The Council should recognise the potential within new significant housing schemes to not only provide for those scheme but to also address underlying capacity issues. Notwithstanding the advent of CIL, a flexible approach may still be required, recognising that 'contributions' to education may arise in a number of forms.	Comments noted. The SE SHMA and the Local Plan CIL and Viability Study will advise on the matters raised by the respondent.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_311	NELFT (Simon Jones) Via Ingleton Wood LLP (Abraham Laker)	In line with Question 8 part 2, it is NELFT's recommendation that existing health and community facilities where possible are encouraged to expand to accommodate additional capacity to support new and existing communities within Thurrock to combat any health equalities experienced at local level. It is proposed that the recommended Health Impact Assessment is used to identify any additional facilities needed.	Comments welcomed. The Council will also work in close partnership with service providers to ensure that future health and growth needs are aligned and met by the provision of improved service and facilities where it is necessary and appropriate to do.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_439	South Ockendon Centre (Wendy Curtis)	More GP Surgeries and minor injury centres	Comments noted. The Council will undertake a full Health Impact Assessment as a key element of the Integrated Assessment (SA/SEA/HIA/EqIA) being prepared in support of the Local Plan. The Council will also work in close partnership with service providers to ensure that future health and growth needs are aligned and met by the provision of improved service and facilities where it is necessary and appropriate to do.	Comments noted. The Council will undertake a full Health Impact Assessment as a key element of the Integrated Assessment (SA/SEA/HIA/EqIA) being prepared in support of the Local Plan. The Council will also work in close partnership with service providers to ensure that future health and growth needs are aligned and met by the provision of improved service and facilities where it is necessary and appropriate to do. Action

Comments ID	Consultee Details	Response to question 22 - What new health and community facilities do you think are needed in the Borough to support both new and existing communities?	Officer Response	Officer Action Points
				The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_246	Starcourt Developments Ltd (Brian Cooke) Via Barton Wilmore (Justine Bailey)	All new development should provide appropriate levels of open space, in order to help build communities. Where possible, development should also allow access to the space beyond built form, and encourage people to use such spaces for leisure and educational purposes. The land within control of our client, Land South of Mar Dyke, has the potential to bring forward a substantial Country Park, which will allow potential residents and other locals the opportunity to enjoy land to which there is currently no public access. Site specific bespoke schemes can ensure such areas are enjoyed by the public and further create social communities as a result.	Comments noted. The Council is preparing a new Active Place Strategy which will identify proposals to improve the nature, quality and provision of leisure and recreational facilities across the whole of Thurrock. The Strategy which is being prepared jointly with Sport England will also identify priorities for funding and will help inform the preparation of the Local Plan including policies to protect open space, including football pitches, from development and to obtain additional funding from developers to maintain and enhance both new and existing leisure opportunities.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_461	Vivian Humphry	We will undoubtedly need another hospital probably bigger than Basildon to cope with the influx into both Boroughs.	Comments noted. The Council will undertake a full Health Impact Assessment as a key element of the Integrated Assessment (SA/SEA/HIA/EqIA) being prepared in support of the Local Plan. The Council will also work in close partnership with service providers to ensure that future health and growth needs are aligned and met by the provision of improved service and facilities where it is necessary and appropriate to do.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.



**Responses to Question 23**

<b>Comment ID</b>	<b>Consultee Details</b>	<b>Response to question 23 - what kind of things could the Local Plan do to protect these valuable community assets?</b>	<b>Officer Response</b>	<b>Officer Action Points</b>
LPIO_514	Daphne Revell	Work hand-in-hand with all social, health & leisure organisations to maximize the use of all precious existing facilities & inter - link the financial support for all these services.	Comments noted. The Council is preparing a new Active Place Strategy which will identify proposals to improve the nature, quality and provision of leisure and recreational facilities across the whole of Thurrock. The Strategy which is being prepared jointly with Sport England will also identify priorities for funding and will help inform the preparation of the Local Plan including policies to protect open space, including football pitches, from development and to obtain additional funding from developers to maintain and enhance both new and existing leisure opportunities.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_55	Industrial Chemicals Ltd Via Lawson Planning Partnership Ltd (Aarti O'Leary)	No observations.	noted.	
LPIO_343	Miller Strategic Land Via MRPP (Richard Robeson)	Protection of community assets is recognised but must be based on sound evidence. Criteria-based policies seeking to protect such facilities must not impose onerous or unrealistic requirements.	Comments noted. The Council will continue to protect valuable community facilities, where they continue to serve local community needs.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_440	South Ockendon Centre (Wendy Curtis)	Ensure their upkeep and maintenance	Comments noted. The Council will also work in close partnership with service providers to ensure that community assets are safeguarded where it is necessary and appropriate to do.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_462	Vivian	Keeping Local Police stations open would be a start!	Comments noted. The Council	The Council will arrange a

<b>Comment ID</b>	<b>Consultee Details</b>	<b>Response to question 23 - what kind of things could the Local Plan do to protect these valuable community assets?</b>	<b>Officer Response</b>	<b>Officer Action Points</b>
	Humphry		will continue to protect valuable community facilities, where they continue to serve local community needs.	meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

#### Responses to Question 24

<b>Comment ID</b>	<b>Consultee Details</b>	<b>Response to question 24 - What approach could the Local Plan take to ensure that issues relating to pollution and air quality are minimised?</b>	<b>Officer Response</b>	<b>Officer Action Points</b>
LPIO_483	Anthony Newell	Grays Thurrock suffers from High levels of pollution. it is difficult to know what you can do with the increase in volume of traffic and new road/tunnel being built it appears in the future. stop proctor and Gamble emitting sticky soap powder, smalls which waft over the Borough.	Agree that the local plan shall continue to contribute to the achievement of sustainable development and this includes strategies to safeguard the environment, mitigating and addressing challenges of climate change and securing good design.	
LPIO_515	Daphne Revell	Firstly, stop the Government from turning our Borough into another Spaghetti junction by carving it up with the LTX. Secondly, the highest pollution is at Dartford Crossing & congestion charge applied here should all come to Thurrock to aid pollution related chest and bronchial /asthma sufferers & prevention aids for air quality.	Comments noted. Accessibility Mapping is a tool commonly used to provide evidence to assist in identifying accessible locations for development. It is intended that this work will sit alongside strategic transport and micro-simulation modelling which will be commissioned at the appropriate time. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Highways England, Essex County Council, TfL and other transport service and	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.



Comment ID	Consultee Details	Response to question 24 - What approach could the Local Plan take to ensure that issues relating to pollution and air quality are minimised?	Officer Response	Officer Action Points
			infrastructure providers as appropriate	
LPIO_109	DP World - London Gateway Via Trevor Hutchinson Planning and Transportation Ltd (Trevor Hutchinson)	- Suitable HGV parking provision at strategic sites. - Support for increased rail freight capacity within rail network - Sustainable transport accessibility (particularly improvements to north /south links - Improved signage for freight traffic.	Comments noted. Accessibility Mapping is a tool commonly used to provide evidence to assist in identifying accessible locations for development. It is intended that this work will sit alongside strategic transport and micro-simulation modelling which will be commissioned at the appropriate time. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Highways England, Essex County Council, TfL and other transport service and infrastructure providers as appropriate	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_56	Industrial Chemicals Ltd Via Lawson Planning Partnership Ltd (Aarti O'Leary)	By directing employment and housing led development to the main urban areas and growth hubs in the Borough.	The Council will seek through a managed growth approach to ensure that growth does not result in the deterioration in the quality of life of residents and visitors.	
LPIO_23	Lawson Planning Partnership Ltd (Jenny Moor)	It is acknowledged that air quality is a prominent issue in Thurrock with the Sustainability Appraisal Scoping Report recording that on the whole air pollution is not improving in the Borough. The draft Local Plan consultation document states at paragraph 63 that the Borough has a history of housing being developed next to heavy industries which has resulted in some poor living conditions. It is the aspiration of the Council to break from previous trends and to minimise pollution, enhance local amenity and provide safe and healthy environments for communities. Therefore, in addition to regenerating suitable previously developed land in the built up areas, the Local Plan should allocate housing development in appropriate locations which are not adversely affected by existing pollution and will encourage sustainable living. Our clients	Comments welcomed. The Council will ensure that the respondent and other stakeholders are fully engaged in the development of the Local Plan evidence base.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

Comment ID	Consultee Details	Response to question 24 - What approach could the Local Plan take to ensure that issues relating to pollution and air quality are minimised?	Officer Response	Officer Action Points
		<p>site, located on the periphery of the Boroughs main urban area, is not adversely affected by existing air quality and pollution issues, yet is well connected by existing public transport links to nearby centres and further afield. The site is therefore well located to ensure that issues in the Borough relating to pollution and air quality will be minimised providing much better living conditions than elsewhere in the Borough.</p>		
LPIO_389	Natural England (Jamie Melvin)	<p>We would expect the plan to address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development, particularly where this impacts on European sites and SSSIs. The environmental assessment of the plan (Sustainability Appraisal and HRA) should also consider any detrimental impacts on the natural environment, and suggest appropriate avoidance or mitigation measures where applicable. Natural England advises that one of the main issues which should be considered in the plan and the SA/HRA are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment. The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. We consider that the designated sites at risk from local impacts are those within 200m of a road with increased traffic<sup>1</sup>, which feature habitats that are vulnerable to nitrogen deposition/acidification. APIS provides a searchable database and information on pollutants and their impacts on habitats and species.</p>	<p>Comments noted. The Council will undertake a full Health Impact Assessment as a key element of the Integrated Assessment (SA/SEA/HIA/EqIA) being prepared in support of the Local Plan.</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>
LPIO_123	Port of London Authority (Helena Payne)	<p>Pollution &amp; Air Quality It goes without saying that the promotion of river transport (for freight and passengers) support the aims of the Borough (set out within paragraphs 61 to 63) for improving CO2 emissions and helping air quality.</p>	<p>Comments welcomed. The Council will ensure that the respondent and other stakeholders are fully engaged in the development of the Local Plan evidence base.</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>

<b>Comment ID</b>	<b>Consultee Details</b>	<b>Response to question 24 - What approach could the Local Plan take to ensure that issues relating to pollution and air quality are minimised?</b>	<b>Officer Response</b>	<b>Officer Action Points</b>
LPIO_90	Rochford District Council (Natalie Hayward)	Rochford District Council would welcome inclusion of sustainable transport modes and encouraging a modal shift within future iterations of the new Local Plan, in addition to appropriate measures to mitigate any future impacts of development on the strategic road network.	Comments noted. Accessibility Mapping is a tool commonly used to provide evidence to assist in identifying accessible locations for development. It is intended that this work will sit alongside strategic transport and micro-simulation modelling which will be commissioned at the appropriate time. 3The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Highways England, Essex County Council, TfL and other transport service and infrastructure providers as appropriate	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_441	South Ockendon Centre (Wendy Curtis)	No more crossings in Thurrock	Comments noted. The Council has or is in the process of commissioning the technical evidence identified by the respondent in order to ensure that the Local Plan adequately addresses the matters raised in their representations.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_554	The Billings Group Via DHA (David Bedford)	In order to improve air quality and regulate pollution, we consider that inappropriately sited commercial sites, such as our clients land at Sandy Lane, should be reallocated for housing to ensure that commercial uses or an antisocial nature are displaced to locations where they will have a less impact upon the amenities of neighbouring properties.	Work on the Housing Land Availability Assessment has commenced with the Call for Sites, and all sites will be considered in accordance with the development of the boroughs spatial strategy taking full account of capacity and constraints.	
LPIO_463	Vivian Humphry	I wish I knew. Any fool knows that the level of expansion envisaged for Thurrock both in terms of industry and population will only make this an insurmountable problem in the future.	Comments welcomed. The Council will work in partnership with the respondent and other stakeholders to ensure that the	The Council will arrange a meeting with the respondent to discuss their representations and to agree

Comment ID	Consultee Details	Response to question 24 - What approach could the Local Plan take to ensure that issues relating to pollution and air quality are minimised?	Officer Response	Officer Action Points
			local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.

Responses to Question 25

Comment ID	Consultee Details	Response to question 25 - What kind of things could the Plan do to help you make more sustainable transport choices?	Officer Response	Officer Action Points
LPIO_484	Anthony Newell	Cheaper / free travel on local public transport. Encourage healthier life styles so people walk short distances rather than driving. Free bus service to Lakeside /Blue Water. Bus / Taxi lanes if possible.	Comments noted. Accessibility Mapping is a tool commonly used to provide evidence to assist in identifying accessible locations for development. It is intended that this work will sit alongside strategic transport and micro-simulation modelling which will be commissioned at the appropriate time. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Highways England, Essex County Council, TfL and other transport service and infrastructure providers as appropriate	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_516	Daphne Revell	A lot of the foot paths in rural areas are very overgrown & need cleaning so people can use these better. a Kent - Essex railway link would be an excellent incentive too.	Comments noted. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Essex County Council, Highways England, Network Rail, Transport for London and other transport service and infrastructure providers. This work will need to consider the impact of development on both the national and local transport networks serving the Borough.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate
LPIO_110	DP World - London	- Suitable HGV parking provision at strategic sites. - Support for increased rail freight capacity within rail	Comments noted. Accessibility Mapping is a tool commonly	The Council will arrange a meeting with the respondent

Comment ID	Consultee Details	Response to question 25 - What kind of things could the Plan do to help you make more sustainable transport choices?	Officer Response	Officer Action Points
	Gateway Via Trevor Hutchinson Planning and Transportation Ltd (Trevor Hutchinson)	network - Sustainable transport accessibility (particularly improvements to north /south links - Improved signage for freight traffic.	used to provide evidence to assist in identifying accessible locations for development. It is intended that this work will sit alongside strategic transport and micro-simulation modelling which will be commissioned at the appropriate time. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Highways England, Essex County Council, TfL and other transport service and infrastructure providers as appropriate	to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_157	Essex Bridleways Association (Sue Dobson)	The provision of more off-road multi-user routes would encourage walking and cycling for both leisure and commuting purposes, and the availability of these routes for equestrians will encourage healthy lifestyles benefiting the health and well-being of the community, especially for women and children, two groups most targeted to increase their exercise levels.	Comments noted. Accessibility Mapping is a tool commonly used to provide evidence to assist in identifying accessible locations for development. It is intended that this work will sit alongside strategic transport and micro-simulation modelling which will be commissioned at the appropriate time. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Highways England, Essex County Council, TfL and other transport service and infrastructure providers as appropriate	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_222	Essex County Council	ECC recommends consideration is given to the opportunities to incorporate the use of green infrastructure	Comments noted. The Council is preparing a new Active Place	The Council will arrange a meeting with the respondent



Comment ID	Consultee Details	Response to question 25 - What kind of things could the Plan do to help you make more sustainable transport choices?	Officer Response	Officer Action Points
	(Lesley Stenhouse)	(natural environment) to optimise its many benefits, such as to help address climate change risks through providing cooling, local flood risk management, carbon reduction and local access to shady outdoor spaces as well as part of wider green infrastructure networks (green corridors), in order to support local biodiversity and healthy living environments. Thurrock Council may wish to ensure that new development proposals contribute to the provision of new multi-functional green infrastructure. Opportunities where minimal impact on the environment and protected species and habitats will occur to open access and encourage sustainable travel should be explored.	Strategy which will identify proposals to improve the nature, quality and provision of leisure and recreational facilities across the whole of Thurrock. The Strategy which is being prepared jointly with Sport England will also identify priorities for funding and will help inform the preparation of the Local Plan including policies to protect open space, including football pitches, from development and to obtain additional funding from developers to maintain and enhance both new and existing leisure opportunities.	to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_223	Essex County Council (Lesley Stenhouse)	ECC, as a neighbouring highway authority, will need to be satisfied with the approach to highway modelling given the strategic location of Thurrock Council to the county of Essex. The new Thurrock local plan should take into account any likely impact on key transport corridors on the A12 Corridor and A127/A13 Corridor and the key strategic junctions and transport corridors, which need to be considered in any modelling, namely M25 junctions 28, 29 and 30/3 Despite recent improvements there are still a number of locations on the local strategic road network where journeys are unreliable or improvements will be required to support significant numbers of new homes. ECC will continue to identify measures to tackle the causes of unreliable journeys and work with local planning authorities to identify investment needs to support growth. Please refer to ECC's response to Questions 1 and 2 above, which provide details on the Essex Transport Strategy, the Local Transport Plan for Essex (June 2011); and the A127 Corridor for Growth an Economic Plan (April 2014), which set out the relevant ECC transport plans, strategies and priorities in South Essex and adjoining area, the Heart of Essex. ECC will continue to work with Thurrock including the development of highways modelling across south Essex which needs to have regard to a number of other national, sub regional and local highway infrastructure projects and investment commitments surrounding the borough. ECC consider the availability of a range of alternative sustainable travel choices, other than the car, to connect residential, employment and other areas is essential. Please refer the Transport strategies and plans listed above and the	Comments welcomed. The Council will ensure that Essex County Council engaged in the development of the Local Plan evidence base. In doing so the Council would welcome further discussion with the County Council on the nature of the evidence base required and the opportunities for the joint - commissioning of technical work across Thurrock and South Essex.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate

Comment ID	Consultee Details	Response to question 25 - What kind of things could the Plan do to help you make more sustainable transport choices?	Officer Response	Officer Action Points
		<p>detailed comments in response to questions 1 &amp; 2, which includes a list of transport priorities for South Essex, and the promotion of sustainable travel choices and raising public awareness. ECC will explore this further with Thurrock Council to identify opportunities to improve the connectivity between a range of sustainable travel options, to provide an integrated transport network, including options such as the such as cycle network. The Essex Cycle Strategy and associated delivery plans for each district / borough sets out ECCs approach and improvements to cycle network across Essex. Crossrail 2: ECC recommend that Thurrock Council has regard to the recent National Infrastructure Commission Report (March 2016) Review of the case for large scale transport investment in London in respect of emerging proposals for Crossrail 2 projects including the potential to extend into South Essex.</p>		
LPIO_131	Highways England (Teresa Gonet)	<p>The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We do not have any particular comments in relation to the Local Plan and Draft Thurrock Design Strategy consultation at the present time other than to state the need to have a full assessment of Local Plan development impacts on the SRN in due course when you consider the traffic implications of any preferred mix of housing and employment. This will need to examine junction and main carriageway impacts on the M25, A282, A13 and A1089. We would be happy to meet when convenient to discuss the assessment requirements further. We hope you find these comments helpful. Please do not hesitate to contact us if you require further information.</p>	<p>Comments noted. Accessibility Mapping is a tool commonly used to provide evidence to assist in identifying accessible locations for development. It is intended that this work will sit alongside strategic transport and micro-simulation modelling which will be commissioned at the appropriate time. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Highways England, Essex County Council, TfL and other transport service and infrastructure providers as appropriate</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.</p>
LPIO_57	Industrial Chemicals Ltd Via Lawson Planning Partnership Ltd (Aarti O'Leary)	<p>By directing employment and housing led development to the main urban areas and growth hubs in the Borough.</p>	<p>Comments welcomed. The Council will ensure that the respondent and other stakeholders are fully engaged in the development of the Local Plan evidence base.</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin</p>

Comment ID	Consultee Details	Response to question 25 - What kind of things could the Plan do to help you make more sustainable transport choices?	Officer Response	Officer Action Points
				the preparation of a sound plan and the allocation of individual sites for development.
LPIO_80	Intu Lakeside Ltd (Marc Myers) Via Nathaniel Lichfield & Partners (Stephanie Walker)	The plans for the Lakeside Basin represent an integrated approach to the delivery of development and associated infrastructure including that required to support sustainable transport choices. Intu supports this approach and it is one that should be carried forward in the Local Plan. It will ensure the needs of Thurrock are met and deliver transformational change in this area.	Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace. As part of the process of preparing the new Local Plan the Council will need to review the current policy approach for Lakeside and to update the quantitative projections for future retail and convenience shopping needs set out in the adopted Core Strategy. The Council has also prepared the Lakeside Development Framework and the Lakeside Transport Strategy to help inform the preparation of an Inset Plan to manage the future development of the area. Both studies are available to view on the Councils Local Plan website. The Council will engage proactively with neighbouring local authorities through the Duty to Cooperate process to ensure the proper management and development of a competitive and viable network of centres across the Thames Gateway and East	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.

Comment ID	Consultee Details	Response to question 25 - What kind of things could the Plan do to help you make more sustainable transport choices?	Officer Response	Officer Action Points
			London.	
LPIO_24	Lawson Planning Partnership Ltd (Jenny Moor)	It is acknowledged that in order to encourage sustainable transport choices, development needs to be situated where it is well located to public transport networks, encouraging a modal shift from private and single occupancy car journeys. The site at Orsett is already well served by existing public transport links and there is the potential for the development to further improve these links for both existing and future residents in the proximity of the site. Allocating new development in sustainable locations such as this, is key to encouraging more sustainable transport choices and is in accordance with national planning policy contained within the Framework to ensure that developments generating significant movements are located where the need to travel will be minimised and the use of sustainable transport modes maximised (paragraph 34).	Comments noted. Accessibility Mapping is a tool commonly used to provide evidence to assist in identifying accessible locations for development. It is intended that this work will sit alongside strategic transport and micro-simulation modelling which will be commissioned at the appropriate time. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Highways England, Essex County Council, TfL and other transport service and infrastructure providers as appropriate	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_184	Local Access Forum (Sue Dobson)	Sustainable transport choices will only be increased if safe access provision is made for all users, both for commuting and leisure purposes. The provision of safe off road routes will therefore contribute to the health and wellbeing of the community. It should be noted that if new routes are to be provided it should be on the basis that they are fully accessible to ALL users including pedestrians, cyclists, equestrians and disabled users.	Comments noted. Accessibility Mapping is a tool commonly used to provide evidence to assist in identifying accessible locations for development. It is intended that this work will sit alongside strategic transport and micro-simulation modelling which will be commissioned at the appropriate time. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Highways England, Essex County Council, TfL and other transport service and infrastructure providers as	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.

Comment ID	Consultee Details	Response to question 25 - What kind of things could the Plan do to help you make more sustainable transport choices?	Officer Response	Officer Action Points
			appropriate	
LPIO_171	Port of Tilbury (Perry Gladding) Via Vincent and Gorbing (Hannah Philips)	PoTLL are proactively seeking to ensure that opportunities to enhance sustainable travel choices are taken when development takes place. It is considered that the Local Plan needs to set clear priorities for improving local transport choices and how funding (through Community Infrastructure Levy) will be used to support the wider economic and environmental objectives of the Plan. With the move to a much more 24/7 economy, particularly in the logistics sector, strategies need to be developed to ensure that the public transport network better meets the demands of the working population.	Comments noted. Accessibility Mapping is a tool commonly used to provide evidence to assist in identifying accessible locations for development. It is intended that this work will sit alongside strategic transport and micro-simulation modelling which will be commissioned at the appropriate time. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Highways England, Essex County Council, TfL and other transport service and infrastructure providers as appropriate	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_91	Rochford District Council (Natalie Hayward)	Rochford District Council has no specific observations to make, but would welcome policies which promote sustainable transport modes and seek to encourage a modal shift.	Comments noted. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Highways England, Essex County Council, TfL and other transport service and infrastructure providers as appropriate	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_262	S & J Padfield & Partners Via Strutt and Parker LLP (James Firth)	The plan should not only consider infrastructure required to support sustainable transport choices but should focus on locating future development in locations where it is well related to existing sustainable transport infrastructure. South Ockendon railway station and our clients nearby land are particularly good examples of this.	Comments noted. The SE SHMA and the Local Plan CIL and Viability Study will advise on the matters raised by the respondent.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound

Comment ID	Consultee Details	Response to question 25 - What kind of things could the Plan do to help you make more sustainable transport choices?	Officer Response	Officer Action Points
				plan and the allocation of individual sites for development.
LPIO_442	South Ockendon Centre (Wendy Curtis)	No more crossings in Thurrock	Comments noted. Accessibility Mapping is a tool commonly used to provide evidence to assist in identifying accessible locations for development. It is intended that this work will sit alongside strategic transport and micro-simulation modelling which will be commissioned at the appropriate time. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Highways England, Essex County Council, TfL and other transport service and infrastructure providers as appropriate	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate
LPIO_247	Starcourt Developments Ltd (Brian Cooke) Via Barton Wilmore (Justine Bailey)	Paragraph 29 of the NPPF notes that the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel, and paragraph 30 adds that encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. The Local Plan should encourage sites to come forward near this existing infrastructure where possible. However, it must remain flexible, given that not all sites will come forward straight away. The Council are also able to ensure that development is located close to existing services and facilities, rather than being isolated. In terms of employment, locations adjacent to existing employment areas and residential areas should aid the reduction in journeys numbers.	Comments noted. Accessibility Mapping is a tool commonly used to provide evidence to assist in identifying accessible locations for development. It is intended that this work will sit alongside strategic transport and micro-simulation modelling which will be commissioned at the appropriate time. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Highways England, Essex County Council, TfL and	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.



Comment ID	Consultee Details	Response to question 25 - What kind of things could the Plan do to help you make more sustainable transport choices?	Officer Response	Officer Action Points
			other transport service and infrastructure providers as appropriate	

**Responses to Question 26**

<b>Comment ID</b>	<b>Consultee Details</b>	<b>Response to question 26 - Are there any specific sustainable transport projects that the Council should be promoting in the Local Plan?</b>	<b>Officer Response</b>	<b>Officer Action Points</b>
LPIO_485	Anthony Newell	Our roads are becoming riddled with pot holes which are left due to lack of finances. What can be done to improve repairs?	Comments noted. The Council will work in partnership with the respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_517	Daphne Revell	Ensign buses are run on environmentally friendly measures & sustainable sources. Could all buses & taxis be encouraged to use similar means too.	Comments noted. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Essex County Council, Highways England, Network Rail, Transport for London and other transport service and infrastructure providers. This work will need to consider the impact of development on both the national and local transport networks serving the Borough.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate
LPIO_111	DP World - London Gateway Via Trevor Hutchinson Planning and Transportation Ltd (Trevor Hutchinson)	HGV parking facilities at DP world London Gateway - Improvements to Stanford-le-hope rail station which address the accessibility issues resulting from the level crossing	Comments noted. Accessibility Mapping is a tool commonly used to provide evidence to assist in identifying accessible locations for development. It is intended that this work will sit alongside strategic transport and micro-simulation modelling which will be commissioned at the appropriate time. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.

Comment ID	Consultee Details	Response to question 26 - Are there any specific sustainable transport projects that the Council should be promoting in the Local Plan?	Officer Response	Officer Action Points
			The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Highways England, Essex County Council, TfL and other transport service and infrastructure providers as appropriate	
LPIO_205	EA Strategic Land Via Iceni Projects Ltd (David Churchill)	The benefits of sustainable transport choices are clearly outlined in paragraphs 65, 68 of the consultation document and are recognised as an important factor in achieving overall sustainable development. West Horndon is strategically located to provide a sustainable transport option for a variety of people by its proximity and accessibility to the wider road network and the direct access to London Liverpool Street provided by the existing train station. In this regard it is also relevant to note the strong relationship Thurrock shares with London and the requirement to provide good accessible public transport choices to the city. Many of those moving to the Thurrock area have done so for the close proximity and connectivity it has to their existing employment in the City. This is reflected in the continued requirement for C2C service improvements and timetable changes due to 6% rises in customer levels year-on-year. On top of this, it has been proposed as part of study by GHD into growth and transport in East London and Essex that Crossrail could extend to link with the existing Essex Thameside network. The Council should there seek to capitalise on the opportunities provided by an existing, under-utilised train station which already benefits from good levels of accessibility.	Comments noted. Accessibility Mapping is a tool commonly used to provide evidence to assist in identifying accessible locations for development. It is intended that this work will sit alongside strategic transport and micro-simulation modelling which will be commissioned at the appropriate time. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Highways England, Essex County Council, TfL and other transport service and infrastructure providers as appropriate	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate
LPIO_224	Essex County Council (Lesley Stenhouse)	In addition to the comments in response to Question 25, Thurrock Council may wish to refer to the requirement for new developments to have travel plans written and put in place with SMART targets set to achieve a modal shift away from single car occupancy and to encourage more people to use sustainable modes of transport.	Comments noted. Accessibility Mapping is a tool commonly used to provide evidence to assist in identifying accessible locations for development. It is intended that this work will sit alongside strategic transport and micro-simulation modelling which will be commissioned at the appropriate time. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.

Comment ID	Consultee Details	Response to question 26 - Are there any specific sustainable transport projects that the Council should be promoting in the Local Plan?	Officer Response	Officer Action Points
			Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Highways England, Essex County Council, TfL and other transport service and infrastructure providers as appropriate	
LPIO_419	Greater London Authority (Jorn Peters)	Transport for London (TfL) is working with strategic partners including Essex County Council on the East London Transport Option Study (ELTOS) assessing a range of transport options to relieve forecast capacity issues on the C2C/A13 corridor. The emerging Local Plan should take this into account. As the A13 in particular in London experiences high levels of congestion, the Council may wish to consider specific policy support for public transport, walking and cycling and links to railway stations, in particular in the light of the anticipated growth within the wider area.	Comments noted. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Essex County Council, Highways England, Network Rail, Transport for London and other transport service and infrastructure providers. This work will need to consider the impact of development on both the national and local transport networks serving the Borough.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate
LPIO_58	Industrial Chemicals Ltd Via Lawson Planning Partnership Ltd (Aarti O'Leary)	No observations at this stage.	Comments noted.	No further action.
LPIO_344	Miller Strategic Land Via MRPP (Richard Robeson)	The Council should ensure that new development, particularly housing, is viewed as an opportunity to sustain public transport services by re-routing and promoting existing facilities. In that sense, new residential development should not be seen narrowly as an opportunity to fund services via contributions or CIL but as an embedded component which can in fact make previously unviable services sustainable.	Comments welcomed. Accessibility Mapping is a tool commonly used to provide evidence to assist in identifying accessible locations for development. It is intended that this work will sit alongside strategic transport and micro-simulation modelling which will be commissioned at the appropriate time. The Council	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.

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			will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Highways England, Essex County Council, TfL and other transport service and infrastructure providers as appropriate	
LPIO_390	Natural England (Jamie Melvin)	Sustainable transport links could contribute the authorities strategic approach to Green Infrastructure as required under paragraph 114 of the NPPF and assist in the creation green corridors and ecological networks. Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain connectivity to enable free movement and dispersal of wildlife. The environmental impact of any sustainable transport proposal would also need to be considered.	Comments noted. The Council is preparing a new Active Place Strategy which will identify proposals to improve the nature, quality and provision of leisure and recreational facilities across the whole of Thurrock. The Strategy which is being prepared jointly with Sport England will also identify priorities for funding and will help inform the preparation of the Local Plan including policies to protect open space, including football pitches, from development and to obtain additional funding from developers to maintain and enhance both new and existing leisure opportunities.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_124	Port of London Authority (Helena Payne)	The aims of the Local Plan, in terms of transport and connectivity, is to further improve transport, especially with the promotion of regular rail services which operate between London and South-end-on-sea, the use of cycle ways and public rights of way. This could include the promotion of the Thames Path (subject to this not interfering with port security etc.), which would ensure promotion of the River as a pleasant environment and one to enjoy. It is also noted that the Port of Tilbury provides international connections for both passengers and freight. National policy focuses on the importance of sustainable transport choices and the wider role that this can play in achieving sustainability, as well as reducing congestion. It also states that new development should be located	Comments noted. Accessibility Mapping is a tool commonly used to provide evidence to assist in identifying accessible locations for development. It is intended that this work will sit alongside strategic transport and micro-simulation modelling which will be commissioned at the appropriate time. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.

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		where it is accessible to public transport. To reiterate an earlier comment, if development is located in close proximity to the river, the Borough should promote the use of the river as an alternative transport choice in this regard. What provisions or infrastructure could be put in place to aid in achieving this? This section of the document sets out a number of opportunities to improve transport and infrastructure in line with National Policy. However, there are no specific references to the use of the river, which would assist in this regard. This is disappointing, especially given the identified need to do more to promote the river further. The PLA would like to see further consideration given to the use of the River within the Boroughs Transport chapter. The need to reduce our carbon footprint and establish sustainable communities is paramount within National Policy. The use of the river as an alternative transport method would therefore aid in promoting the objective of sustainable communities within the Borough.	deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Highways England, Essex County Council, TfL and other transport service and infrastructure providers as appropriate	
LPIO_443	South Ockendon Centre (Wendy Curtis)	Improve local bus service.	Comments noted. Accessibility Mapping is a tool commonly used to provide evidence to assist in identifying accessible locations for development. It is intended that this work will sit alongside strategic transport and micro-simulation modelling which will be commissioned at the appropriate time. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Highways England, Essex County Council, TfL and other transport service and infrastructure providers as appropriate	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.

**Responses to Question 27**

<b>Comment ID</b>	<b>Consultee Details</b>	<b>Question 27 - Are there any specific road transportation projects that the Council should be promoting in the Local Plan?</b>	<b>Officer Response</b>	<b>Officer Action Points</b>



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LPIO_518	Daphne Revell	Again to get a new link for the A130 in Essex to the M2 in Kent via a tunnel at Canvey Island. Tunnels can now be bored under environmental marshes etc. without disturbing surface habitats. this would greatly aid the new Thames port at Stafford-le-hope with the 18,000 containers. the new ships carry. Not everything needs to go via Dartford Tunnel.	Comments noted. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Essex County Council, Highways England, Network Rail, Transport for London and other transport service and infrastructure providers. This work will need to consider the impact of development on both the national and local transport networks serving the Borough.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate
LPIO_113	DP World - London Gateway Via Trevor Hutchinson Planning and Transportation Ltd (Trevor Hutchinson)	- A13 three lane widening - Network resilience (Dartford Crossing) - Suitable HGV parking facilities	Comments noted. Accessibility Mapping is a tool commonly used to provide evidence to assist in identifying accessible locations for development. It is intended that this work will sit alongside strategic transport and micro-simulation modelling which will be commissioned at the appropriate time. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Highways England, Essex County Council, TfL and other transport service and infrastructure providers as appropriate	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_225	Essex County Council (Lesley	For details of relevant transport projects within Essex Overall a strategic approach to transport provision for improved accessibility to jobs, services and facilities via	Comments welcomed. The Council will ensure that Essex County Council engaged in the	The Council will arrange a meeting with the respondent to discuss their

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	Stenhouse)	<p>an enhanced and better integrated transport network is supported and, to achieve this, ECC will work with Thurrock Council and liaise with partners including public transport providers, Highways England and the South East Local Enterprise Partnership (SELEP) to secure the necessary improvements to the transport networks. This includes improvements to the A13 to support growth both in Thurrock and more widely across the South Essex sub region. In terms of freight movements, a clear strategy to keep freight to the strategic road network and site development with intensive freight movements as near as possible to the strategic network will help to reduce the impacts on the local network. ECC acknowledge and support the ongoing partnership working with Thurrock Council and other south Essex Boroughs and Districts to support growth and reduce the impact on the transport network and acknowledge the need for further highways modelling work. ECC will continue to work with Thurrock and the South Essex Authorities to undertake the further transport evidence in support of emerging Local Plans. The further work includes: A127/A130 Fairglen Interchange, including further Duty to Co-operate cross boundary engagement, with Basildon BC, Rochford DC, Castle Point BC, Southend on Sea BC with regard to the potential highway improvements on the A127/A130 Fairglen Interchange; Lower Thames Crossing (LTC). ECC consultation response to the recent Highways England consultation is set attached for your information (see Appendix 1). ECC notes that the routes proposed have a range of potential Implications / Opportunities including three possible routes within Option C, with all three proposals including a new junction(s) on the A13, however: - routes 2 and 3 proposed a new direct connection to the M25, between junctions 29 and 30; - route 4 proposed a north-south route to connect to the A127 in the vicinity of the A127/A128 (Halfway House) with A127 improvements between the M25 and A127/A128. ECC consider the impacts of the solutions of the LTC proposals will need to be assessed and factored in to the modelling in support of the Thurrock Local Plan, neighbouring Local Plans in South Essex and the proposed joint strategic South Essex transport modelling, regardless of the LTC route to be announced by Ministers later this year. It is considered the LTC would have an impact on and opportunities for Thurrock and the wider transport network across South Essex and Greater Essex. For example, potential funding for the A127 improvements as defined in the A127 Corridor for Growth an Economic</p>	<p>development of the Local Plan evidence base. In doing so the Council would welcome further discussion with the County Council on the nature of the evidence base required and the opportunities for the joint - commissioning of technical work across Thurrock and South Essex.</p>	<p>representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate</p>

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		Plan; or potential solutions in respect of the A127/A130 Fairglen interchange; which could influence the preferred transport mitigation and cost implications. These highway improvements have been identified in advance of any announcement on the LTC and it is noted that these will need to be re-visited.		
LPIO_258	GSE Group Via Icen Projects Ltd (Jamie Stanley)	<p>The GSE Group has experience in managing lorry parks in south-east England, including The Ashford International Truck stop. This secure facility has real-time information concerning parking provision, restaurant and cafes, shower facilities, laundry services and Internet access. The site is open 24hrs a day and provides an enclosed facility, with CCTV coverage, and security patrols. The GSE Group is developing a remote internet based intelligent pre-booking system that will enable operators to pre-book a specific parking bay, not just ensuring that one is available but levels of security in compliance with the Brussels directive and segregation for hazardous goods, refrigerated loads, livestock etc. This international programme will prevent unnecessary mileage, out of time running, illegal and inconsiderate parking also providing authorities policing HGV parking to have real-time information on availability allowing them to enforce the law and insisting the driver pre-pays to reserve parking in controlled sites. The GSE Group has identified a potential HGV parking-facility site immediately adjacent to the M25 in Thurrock. The site is extremely well positioned, as not only directly alongside the M25 motorway, but also a short-distance from the A1. The site is also a short distance from several waypoints, including the Dartford tolls, and the London Low Emission Zone. The GSE Group has taken an active role in the preparation of previous iterations of the local plan and having previously provided representations on the Site Specific Allocations DPD in March 2013, the Core Strategy Focused Review in September 2014, and the Thurrock Local Plan Call for Sites in January 2015. Within the last few years, we understand that the provision of adequate HGV parking has become an increasing matter of concern for residents of the Borough. These concerns have arisen from the increase in HGV movements through residential areas fly tipping, and anti-social behaviour. Conversely, for the operators, the need for secure parking premises is becoming increasingly necessary for insurance reasons to safeguard transported freight and ensure the safety and well-being of HGV drivers. Parking provision is also sought for HGV drivers as a result of the London Low Emission Zone, which is positioned to the extreme west of</p>	<p>Comments welcomed. The Council will work in partnership with the respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>

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		<p>the Borough. Here, HGV drivers regularly park unlawfully to facilitate HGV operators to switch cabs to ensure that vehicles entering the London comply with low-emission regulations. The above issues are recognised in the Thurrock Council Overnight Parking in Thurrock study (November 2010), which was prepared as a pre-cursor to the LDF Core Strategy and Site Specific Allocations DPD. Key conclusions from this assessment include:</p> <ul style="list-style-type: none"> <li>• Inappropriate overnight roadside parking of HGVs has been a major public concern in Thurrock for many years (Para 7).</li> <li>• The M25 is the busiest route in the Borough, as one might expect, with up to 20,000 HGV movements per day. The A13 between London and Tilbury experiences up to 10,000 HGV movements (Para 2).</li> <li>• The most intense HGV traffic occurs on the Tilbury Dock Approach (up to 40% of total traffic) and in the West Thurrock area surrounding the M25 Junction 30/31 (Para 2).</li> <li>• Available truck stops are insufficient for the demand and further capacity would contribute to a solution. Survey information would suggest that a provision of an additional 300 spaces (Para 9). These points were further exemplified in a March 2012 Thurrock Lorry Parking Study, with key points including:</li> <li>• Thurrock's strategic location next to the M25 and the A13, as well as its proximity to Tilbury docks, results in high volumes of freight traffic (Para. 7).</li> <li>• Thurrock ranks as the highest priority area in the Eastern region with significant numbers of lorries parking in lay-bys and a significant number of high value thefts recorded (Para 8).</li> <li>• There is an existing shortfall in lorry parking capacity in Thurrock, this shortfall will be exacerbated (more than doubled) by 2026 if no additional lorry parking infrastructure is brought forward (Para 9.4). The Plan recognises the Boroughs importance as a strategic transport and distribution hub serving London and the wider region. Paragraph 72 of the Plan highlights the need to effectively manage traffic issues caused by industrial and commercial development such as parking, HGV routing and provision of welfare facilities. Planning for strategic infrastructure requires cross-boundary working. This is recognised in the Local Plan Issues and Options (Paragraph 14). This duty to co-operate should include HGV parking facilities given that both the M25 and A13 intersect the Borough. Moreover, a new Lower Thames Crossing is likely to encourage greater transnational HGVs to pass through the Borough. As a consequence, local authorities and stakeholders such as Highways England should look to establish the best location to</li> </ul>		

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		<p>position a HGV lorry parking facility. f. Meeting Need the Local Plan Issues and Options does make reference to the importance of effectively managing parking, HGV routing and the provision of welfare facilities. Given the recognised issue outlined above, and the unique characteristics of Thurrock, we do stress the importance of including allocation for HGV parking within the Local Plan. Thurrock Councils Site Specific Allocations and Policies Local Plan, though never finally adopted, identified several broad locations for HGV parking facilities. These include Tilbury Marshes and London Gateway Port and Logistics Park. The former received planning consent on 27 March 2012 (10/50157/TTGOUT) and will comprise of HGV parking for 568 HGVs, although only 20% will be for casual users. It is considered unlikely that DP World, as the operators of London Gateway Port and Logistics Park will invite casual users. This is because a) the port operators will want to retain HGV parking for port-users and, b) unless specifically travelling to the port this site is over a 20-mile around trip from the M25, so is unlikely to attract casual users. HGV parking to the west of the Borough is even more limited, with just a single secure HGV parking facility, positioned on the former West Thurrock Power Station site. This site is not route marked from either the M25 or A13 so its capability in attracting casual users is limited. As a consequence, HGV parking at Titan Works is largely on a contractual basis for fleets of domestic operators. This site does also not provide direct access from the strategic highway network. Instead, HGVs are required to pass through residential areas to enable access. From the consultation document it is apparent that further work is required by Thurrock Council to ensure that future provision for HGV parking is met. When assessing the appropriateness of a site for lorry parking, factors such as distance to/from strategic highway network, whether HGVs are required to pass through residential areas, ability to reduce CO2 emissions, and navigability of HGV parking sites should all be important considerations. And, thereafter in defining these locations it is important that the Local Planning Authority determine what type of lorry parks these will be, so that casual and holding needs can be met. The DfT as part of its Lorry Parking Study (2011) also recommend that areas prone to vehicle crime are established, with the DfT explicitly stating that this crime-based evidence could to inform the preparation Local Development Framework Documents and potentially allocate suitable land for lorry parking. In accordance with NPPF, the creation of a HGV</p>		



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		park in this location will not only support the local economy, but respond to expanding logistical / distribution industries in the area, and support the safe / secure passage of road freight in the UK. In addition to promoting economic growth, HGV parking at this site would also have a minimal impact on local amenity. Additional HGV mileage to this parking facility would be minimal, and would be likely to provide the benefits in terms of air quality, road safety, and carbon reductions when compared with alternative sites being considered by Thurrock Council. For the reasons outlined above, the GSE Group believe that the emerging Local Plan needs significantly more emphasis on HGV parking in the region. This work should also establish the credentials of what makes a suitable HGV parking facility.		
LPIO_59	Industrial Chemicals Ltd Via Lawson Planning Partnership Ltd (Aarti O'Leary)	No observations at this stage.	Comments noted	No further action.
LPIO_357	Medway Council (Catherine Smith)	It is noted that the Thurrock Council is not supportive of the present preferred option for the Lower Thames Crossing being put forward by Highways England. However, consideration will need to be made as to the potential impact of this project if it were to come forward during the plan period proposed. If Thurrock Council is to move forward with a similar level of wharves and the protection of these then Medway Council would like to participate in these discussions due to its own significant wharf infrastructure.	Comments noted. Until such time as the Government makes a decision on the Lower Thames Crossing it remains difficult for the Council to plan appropriately for the future development of Thurrock.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_345	Miller Strategic Land Via MRPP (Richard Robeson)	The A13 Stifford Clays interchange has several problems, both in terms of the geometry creating excessive speed through the junction (preventing vehicles from merging with junction traffic) and as barrier to pedestrian and cycle movement between Grays and North Stifford. Traffic light controls, improved road markings and new crossing facilities would help address these issues.	Comments noted. Accessibility Mapping is a tool commonly used to provide evidence to assist in identifying accessible locations for development. It is intended that this work will sit alongside strategic transport and micro-simulation modelling which will be commissioned at the appropriate time. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and	Support welcomed. Accessibility Mapping is a tool commonly used to provide evidence to assist in identifying accessible locations for development. It is intended that this work will sit alongside strategic transport and micro-simulation modelling which will be commissioned at the appropriate time. The Council will ensure that the Local Plan is underpinned by



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			<p>deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Highways England, Essex County Council, TfL and other transport service and infrastructure providers as appropriate</p>	<p>the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Highways England, Essex County Council, TfL and other transport service and infrastructure providers as appropriate Action The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty To Cooperate.</p>
LPIO_391	Natural England (Jamie Melvin)	<p>The council will need to consider potential impacts upon designated sites from any transport proposals put forward in the plan. Other than direct effects (building on any part of a designated site) our main concerns are likely to be surface run off, noise and disturbance, the severance of important environmental corridors and air quality (see question 24). Early engagement with Natural England (including through our Discretionary Advice Service) would help to identify potential issues and potential avoidance or mitigation measures that may be required.</p>	<p>An integrated Sustainability Appraisal is being commissioned as part of the Local Plan evidence base.</p>	
LPIO_172	Port of Tilbury (Perry Gladding) Via Vincent and Gorbing (Hannah Philips)	<p>PoTLL consider that the Local Plan should take account of the likely delivery of the Lower Thames Crossing within the lifetime of the plan. Whilst understanding the Councils concerns regarding the impact of the LTC, PoTLL consider that there will be significant benefits to Thurrock, both economically and environmentally, in improving the accessibility of markets both north and south of the river, taking traffic off unsuitable local roads, and reducing the adverse economic impact of congestion at the Dartford Crossing. The Port believes that it is vital that the LTC proposals are integrated with and support long term strategic planning in the Thurrock area and a decision on the route of the LTC, and in particular how it facilitates economic development in the borough, is crucial to that</p>	<p>Comments noted. Until such time as the Government makes a decision on the Lower Thames Crossing it remains difficult for the Council to plan appropriately for the future development of Thurrock.</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>

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		<p>forward planning process. The emerging Local Plan rightly has a continued focus on growth and regeneration. The Port considers these economic objectives to be of fundamental importance to the future success of Thurrock and the wider sub-region. The Port is strongly of the view that the emerging Local Plan must and will retain the Tilbury area as an economic hub given its proven track record to date in delivering new jobs and the clear future potential of growth at the Port. However, delivery of the Local Plan needs a commitment to ensure that the LTC provides significantly improved connectivity directly to the Port of Tilbury area. PoTLL have made representations to Highways England in this regard. It is, therefore, of vital importance that there is an integrated approach between planning the LTC and the emerging Local Plan for Thurrock. If this occurs, the LTC will play an important role in facilitating economic growth in the area. If it does not, and particularly if there is a protracted period of uncertainty regarding LTC, there is a real danger of a similar uncertainty in the Local Plan process. More locally, PoTLL consider that there is a need to review the highway network in the vicinity of the existing Port and Tilbury 2, and will be discussing this matter in further detail with the Council as plans for the area emerge.</p>		
LPIO_92	Rochford District Council (Natalie Hayward)	<p>Rochford District Council welcomes opportunities for both Councils to continue to engage on the issue of the strategic road network, with particular reference to A127, A13 and Fair Glen interchange, in the preparation of the respective local development plans.</p>	<p>comments noted. The Council notes the Comments made by Rochford District Council in respect of the strategic road network, with particular reference to A127, A13 and Fair Glen interchange</p>	<p>The comments made by Rochford District Council will be taken into account in the assessment of future transport technical studies.</p>

**Responses to Question 28**

<b>Comment ID</b>	<b>Consultee Details</b>	<b>Response to question 28 - What kind of things can the plan do to reduce the adverse impacts of freight movements?</b>	<b>Officer Response</b>	<b>Officer Action Points</b>
LPIO_486	Anthony Newell	Encourage firms to transport freight at night/early morning. Also use of rail to transport freight.	Comments welcomed. The Council will work in partnership with the respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_519	Daphne Revell	On the continent lorries/HGVs cannot travel on a Sunday & that would be a wonderful idea to introduce in the UK.	Hours of operation are a matter for the development management process in responding to planning applications.	No further action.
LPIO_112	DP World - London Gateway Via Trevor Hutchinson Planning and Transportation Ltd (Trevor Hutchinson)	Increased rail Freight capacity - Highway network resilience - Suitable HGV parking facilities - Freight traffic signage strategy	Comments noted. Accessibility Mapping is a tool commonly used to provide evidence to assist in identifying accessible locations for development. It is intended that this work will sit alongside strategic transport and micro-simulation modelling which will be commissioned at the appropriate time. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Highways England, Essex County Council, TfL and other transport service and infrastructure providers as appropriate	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_226	Essex County Council (Lesley	The EPfE and the following South Essex priorities are considered relevant: Improving journey time reliability on strategic inter-urban routes including the A127, A129,	Comments welcomed. The Council will ensure that Essex County Council engaged in the	The Council will arrange a meeting with the respondent to discuss their

Comment ID	Consultee Details	Response to question 28 - What kind of things can the plan do to reduce the adverse impacts of freight movements?	Officer Response	Officer Action Points
	Stenhouse)	A130 and the A13; and Improving access to London Gateway port and London Southend Airport.	development of the Local Plan evidence base. In doing so the Council would welcome further discussion with the County Council on the nature of the evidence base required and the opportunities for the joint - commissioning of technical work across Thurrock and South Essex.	representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate
LPIO_60	Industrial Chemicals Ltd Via Lawson Planning Partnership Ltd (Aarti O'Leary)	By directing major employment and waste management proposals to sites which have the potential to transport a proportion of goods by river based means.	Comments welcomed. The Council will ensure that the respondent and other stakeholders are fully engaged in the development of the Local Plan evidence base.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_346	Miller Strategic Land Via MRPP (Richard Robeson)	A lack of facilities and overnight parking is a significant issue presently causing significant impacts in the Borough (e.g. inappropriate on-road parking, accidents and impact on local amenity). Despite the Council's previous assessment identifying a shortfall of existing HGV facilities in the Borough, this did not translate into allocations or related policies. The Council is asked to review this again and make sensible provision through the development plan.	Comments noted. Accessibility Mapping is a tool commonly used to provide evidence to assist in identifying accessible locations for development. It is intended that this work will sit alongside strategic transport and micro-simulation modelling which will be commissioned at the appropriate time. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Highways England, Essex County Council, TfL and other transport service and infrastructure providers as appropriate	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_392	Natural England	Careful consideration of environmental impacts will need to be given to any specific freight proposals. Early	Comments noted. The Council will ensure that the	The Council will arrange a meeting with the respondent

Comment ID	Consultee Details	Response to question 28 - What kind of things can the plan do to reduce the adverse impacts of freight movements?	Officer Response	Officer Action Points
	(Jamie Melvin)	engagement with Natural England could help to identify potential issues and potential avoidance or mitigation measures that may be required.	Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Essex County Council, Highways England, Network Rail, Transport for London and other transport service and infrastructure providers. New proposals for freight will be subject to SA.	to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_173	Port of Tilbury (Perry Gladding) Via Vincent and Gorbing (Hannah Philips)	Many of the comments above apply to this question. The impact of freight movements will to some extent be addressed by external factors such as improvements to emission controls and engine technology. However, improvements to the connectivity to the Port including the LTC will allow for growth without adverse impacts on the locality. Many other issues, such as litter and illegal parking of HGVs, are regulatory and enforcement issues that need to be positively addressed outside of the Local Plan process. HGV parking, including welfare facilities, have been provided at London Distribution Park. The Local Plan needs to positively plan for future facilities.	Growth will only be accommodated where its impacts on the Strategic Road Network are acceptable, or can be mitigated to on an acceptable level. As such the Council has commissioned a series of transport studies, the findings of which will inform the emerging Local Plan.	
LPIO_444	South Ockendon Centre (Wendy Curtis)	Make more use of waterways	Comments noted. Accessibility Mapping is a tool commonly used to provide evidence to assist in identifying accessible locations for development. It is intended that this work will sit alongside strategic transport and micro-simulation modelling which will be commissioned at the appropriate time. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Highways England, Essex County Council, TfL and	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.

<b>Comment ID</b>	<b>Consultee Details</b>	<b>Response to question 28 - What kind of things can the plan do to reduce the adverse impacts of freight movements?</b>	<b>Officer Response</b>	<b>Officer Action Points</b>
			other transport service and infrastructure providers as appropriate	
LPIO_465	Vivian Humphry	Rail rather than road movement.	Comments noted. Accessibility Mapping is a tool commonly used to provide evidence to assist in identifying accessible locations for development. It is intended that this work will sit alongside strategic transport and micro-simulation modelling which will be commissioned at the appropriate time. The Council will ensure that the Local Plan is underpinned by the development a robust transport evidence base and deliverable Transport Strategy. The Council will develop an appropriate evidence base working in partnership with other key delivery partners including Highways England, Essex County Council, TfL and other transport service and infrastructure providers as appropriate	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.

#### Responses to Question 29

<b>Comment ID</b>	<b>Consultee Details</b>	<b>Response to question 29 - What things could the plan do to protect and enhance the Borough's listed building and conservation areas?</b>	<b>Officer Response</b>	<b>Officer Action Points</b>
LPIO_487	Anthony Newell	Volunteers donations to help look after and maintain the sites.	Comments noted.	No action.
LPIO_520	Daphne Revell	Do not allow developers to build on or close to sites of historic interest especially the proposed tunnel if the crossing is to be between Tilbury & East Tilbury as this is land which is of historic interest going close to west Tilbury & destroying historic marchland.	Comments noted. The Local Plan will have a key role to play in providing an appropriate planning policy framework to safeguard and enhance the Boroughs built, natural and historic environment. The Council has commissioned an update of the evidence base to ensure that the Local Plan achieves the objectives through	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.



Comment ID	Consultee Details	Response to question 29 - What things could the plan do to protect and enhance the Borough's listed building and conservation areas?	Officer Response	Officer Action Points
			the proper identification of Thurrock's built, natural and historic assets and the management issues associated with each designation and site.	
LPIO_227	Essex County Council (Lesley Stenhouse)	Questions 29 and 30 are targeted to the built heritage only and Thurrock Council may wish to broaden the historic environment section to include the historic landscape or archaeological deposits of the authority within the emerging Local Plan and accompanying SA/SEA scoping report. At present the SA/SEA scoping report omits reference to the extensive undesignated historic environment assets identified in the Historic Environment Record including cropmark complexes and Palaeolithic deposits. The Historic Environment Record should be identified in the SEA as containing this data.	Comments noted. The Local Plan will have a key role to play in providing an appropriate planning policy framework to safeguard and enhance the Boroughs built, natural and historic environment. The Council has commissioned an update of the evidence base to ensure that the Local Plan achieves the objectives through the proper identification of Thurrock's built, natural and historic assets and the management issues associated with each designation and site.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_299	Gladman Developments Ltd (Phil Bamford)	Gladman consider that the Council should closely follow the guidance given in the Framework for heritage assets. The Framework states that if the harm to a heritage asset is deemed to be substantial then the proposal needs to achieve substantial public benefits to outweigh that harm. If the harm is less than substantial, then the harm should be weighed against the public benefits of the proposal including securing its optimum viable use. Paragraph 135 of the Framework relates specifically to non-designated heritage assets and the policy test that should be applied in these cases is that a balanced judgment should be reached having regard to the scale of any harm and the significance of the heritage asset.	Comments noted. The Local Plan will have a key role to play in providing an appropriate planning policy framework to safeguard and enhance the Boroughs built, natural and historic environment. The Council has commissioned an update of the evidence base to ensure that the Local Plan achieves the objectives through the proper identification of Thurrock's built, natural and historic assets and the management issues associated with each designation and site.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_68	Historic England (Michael Stubbs)	The issues and options consultation refers to the adopted Core Strategy and its identification of priority assets at Tilbury Fort and Coalhouse Fort and the Bata Factory Complex. Adopted Core Strategy Policy CSTP 24 on Heritage Assets and the Historic Environment sets out a key conservation strategy and includes regeneration and enhancement objectives. Six priority assets are identified (the setting of Tilbury Fort, the setting of Coalhouse Fort and the conservation of its fabric, relationship between the Thames and historic development of Thurrock, promotion of public access between Tilbury Fort and Coalhouse Fort	Comments noted. The Local Plan will have a key role to play in providing an appropriate planning policy framework to safeguard and enhance the Boroughs built, natural and historic environment. The Council has commissioned an update of the evidence base to ensure that the Local Plan achieves the objectives through	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

Comment ID	Consultee Details	Response to question 29 - What things could the plan do to protect and enhance the Borough's listed building and conservation areas?	Officer Response	Officer Action Points
		<p>through riverside access, that development close to or within Bata village contributes positively to their setting and that Thurrock's historic landscapes are appropriately considered in development proposals). The setting of Tilbury Fort includes views from the river and the protection of open land from encroachment around the scheduled monument. This policy also links to supporting text at paragraph 36 of the Core Strategy. Recognition of the importance of Tilbury Fort and its setting, including its enhancement, was a matter of revision during the production of the Core Strategy. Coalhouse Fort is a remarkably well preserved late 19th century fort and one of the finest examples of an armoured casemate fort in England and is well documented historically. The group of structures it contains demonstrate the changing approaches to defence over the last 400 years. A positively worded conservation strategy and policy is required with attention to the heritage-at-risk status of this highly significant heritage asset. The Lower Thames Crossing proposals have potential to affect this heritage asset and protection and enhancement of the scheduled monument will require continued reference to the fabric and setting of Coalhouse Fort. The Core Strategy contains a series of policies designed to both protect and enhance heritage assets and to address heritage regeneration and their enhancement. The further protection and enhancement of a series of identified priority assets is to be encouraged as an appropriate way of ensuring that the Local Plan is consistent with the Governments objective of establishing a positive strategy for the conservation and enjoyment of the historic environment. To deliver the Governments objectives as set out in the NPPF at paragraph 126, Historic England would promote the approach taken in policy CSTP24 Heritage Assets and the Historic Environment as a foundation for the vision in the issues and options and the future Local Plan. A further review of settings policy is recommended in light of new Historic England policy and Government policy in the NPPF which both post-date the Core Strategy examination in March 201 This includes Advice Note 3 The Setting of Heritage Assets which can be accessed at <a href="https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpapdf/">https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpapdf/</a> Tilbury Fort and Coalhouse Fort are heritage assets of exceptional significance. Tilbury Fort is England's most spectacular surviving example of a late 17th century coastal fort. Coalhouse Fort is a remarkably well preserved late 19th century fort and one of the finest examples of an armoured casemate fort in England and is</p>	<p>the proper identification of Thurrock's built, natural and historic assets and the management issues associated with each designation and site.</p>	

Comment ID	Consultee Details	Response to question 29 - What things could the plan do to protect and enhance the Borough's listed building and conservation areas?	Officer Response	Officer Action Points
		<p>well documented historically. We have mentioned the setting of Coalhouse Fort above. The setting of Tilbury Fort should be enhanced as development comes forward and as the Local Plan allocates land. Matters of green belt review, lorry parking within the setting and the location of waste facilities within the setting have all been the subject of previous review. Further work to protect and enhance setting should be developed against the new policy foundations of AN 3 and the National Planning Policy Framework paragraph 13 Table 6-4 of the sustainability appraisal site appraisal methodology deals with matters of cultural heritage and places considerable emphasis on the setting of heritage assets when determining major / minor / positive and negative outcomes. A review of settings policy is appropriate as the new local plan is developed. The Lower Thames Crossing route options and consultation closed on 24th March 2016 and Historic England have submitted comments on these options. Option C bored tunnel is an option that would affect Thurrock and potentially the scheduled monuments and listed buildings to the north of the river, involving both Tilbury Fort and Coalhouse Fort as is confirmed in the recent consultation details. The progress on this matter of major infrastructure will inevitably overlap with the production of the Local Plan and this gives added emphasis to the importance of having robust policies for the protection and enhancement of the historic environment. Question 30 Are there any buildings of significance in your local community which should be included on a local heritage list? If yes, please provide details including its location and the reason why it is special to your community. Historic England would draw attention to its guidance on local designations, which can be accessed at <a href="https://historicengland.org.uk/listing/what-is-designation/local/">https://historicengland.org.uk/listing/what-is-designation/local/</a></p>		
LPIO_407	Historic England (Michael Stubbs)	<p>The issues and options consultation refers to the adopted Core Strategy and its identification of priority assets at Tilbury Fort and Coalhouse Fort and the Bata Factory Complex. Adopted Core Strategy Policy CSTP 24 on Heritage Assets and the Historic Environment sets out a key conservation strategy and includes regeneration and enhancement objectives. Six priority assets are identified (the setting of Tilbury Fort, the setting of Coalhouse Fort and the conservation of its fabric, relationship between the Thames and historic development of Thurrock, promotion of public access between Tilbury Fort and Coalhouse Fort through riverside access, that development close to or within Bata village contributes positively to their setting and that Thurrock's historic landscapes are appropriately</p>	<p>Comments noted. The Local Plan will have a key role to play in providing an appropriate planning policy framework to safeguard and enhance the Boroughs built, natural and historic environment. The Council has commissioned an update of the evidence base to ensure that the Local Plan achieves the objectives through the proper identification of Thurrock's built, natural and historic assets and the</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>

Comment ID	Consultee Details	Response to question 29 - What things could the plan do to protect and enhance the Borough's listed building and conservation areas?	Officer Response	Officer Action Points
		<p>considered in development proposals). The setting of Tilbury Fort includes views from the river and the protection of open land from encroachment around the scheduled monument. This policy also links to supporting text at paragraph 36 of the Core Strategy. Recognition of the importance of Tilbury Fort and its setting, including its enhancement, was a matter of revision during the production of the Core Strategy. Coalhouse Fort is a remarkably well preserved late 19th century fort and one of the finest examples of an armoured casemate fort in England and is well documented historically. The group of structures it contains demonstrate the changing approaches to defence over the last 400 years. A positively worded conservation strategy and policy is required with attention to the heritage-at-risk status of this highly significant heritage asset. The Lower Thames Crossing proposals have potential to affect this heritage asset and protection and enhancement of the scheduled monument will require continued reference to the fabric and setting of Coalhouse Fort. The Core Strategy contains a series of policies designed to both protect and enhance heritage assets and to address heritage regeneration and their enhancement. The further protection and enhancement of a series of identified priority assets is to be encouraged as an appropriate way of ensuring that the Local Plan is consistent with the Governments objective of establishing a positive strategy for the conservation and enjoyment of the historic environment. To deliver the Governments objectives as set out in the NPPF at paragraph 126, Historic England would promote the approach taken in policy CSTP24 Heritage Assets and the Historic Environment as a foundation for the vision in the issues and options and the future Local Plan. A further review of settings policy is recommended in light of new Historic England policy and Government policy in the NPPF which both post-date the Core Strategy examination in March 2011 This includes Advice Note 3 The Setting of Heritage Assets which can be accessed at <a href="https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpapdf/">https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpapdf/</a> Tilbury Fort and Coalhouse Fort are heritage assets of exceptional significance. Tilbury Fort is England's most spectacular surviving example of a late 17th century coastal fort. Coalhouse Fort is a remarkably well preserved late 19th century fort and one of the finest examples of an armoured casemate fort in England and is well documented historically. We have mentioned the setting of Coalhouse Fort above. The setting of Tilbury Fort should be enhanced as development comes forward</p>	<p>management issues associated with each designation and site.</p>	

Comment ID	Consultee Details	Response to question 29 - What things could the plan do to protect and enhance the Borough's listed building and conservation areas?	Officer Response	Officer Action Points
		and as the Local Plan allocates land. Matters of green belt review, lorry parking within the setting and the location of waste facilities within the setting have all been the subject of previous review. Further work to protect and enhance setting should be developed against the new policy foundations of AN 3 and the National Planning Policy Framework paragraph 13 Table 6-4 of the sustainability appraisal site appraisal methodology deals with matters of cultural heritage and places considerable emphasis on the setting of heritage assets when determining major / minor / positive and negative outcomes. A review of settings policy is appropriate as the new local plan is developed. The Lower Thames Crossing route options and consultation closed on 24th March 2016 and Historic England have submitted comments on these options. Option C bored tunnel is an option that would affect Thurrock and potentially the scheduled monuments and listed buildings to the north of the river, involving both Tilbury Fort and Coalhouse Fort as is confirmed in the recent consultation details. The progress on this matter of major infrastructure will inevitably overlap with the production of the Local Plan and this gives added emphasis to the importance of having robust policies for the protection and enhancement of the historic environment.		
LPIO_25	Lawson Planning Partnership Ltd (Jenny Moor)	The importance of protecting and enhancing the historic environment is acknowledged. Our clients site is not located within a Conservation Area and there are no Listed Buildings within close proximity of the site upon which any development would have an adverse impact.	Comments noted. The Local Plan will have a key role to play in providing an appropriate planning policy framework to safeguard and enhance the Boroughs built, natural and historic environment. The Council has commissioned an update of the evidence base to ensure that the Local Plan achieves the objectives through the proper identification of Thurrock's built, natural and historic assets and the management issues associated with each designation and site.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_445	South Ockendon Centre (Wendy Curtis)	Uncertain	Comments noted	No further action.
LPIO_466	Vivian Humphry	Rigorously enforce planning and conservation rules.	Comments noted. The Local Plan will have a key role to play	The Council will arrange a meeting with the respondent

Comment ID	Consultee Details	Response to question 29 - What things could the plan do to protect and enhance the Borough's listed building and conservation areas?	Officer Response	Officer Action Points
			<p>in providing an appropriate planning policy framework to safeguard and enhance the Boroughs built, natural and historic environment. The Council has commissioned an update of the evidence base to ensure that the Local Plan achieves the objectives through the proper identification of Thurrock's built, natural and historic assets and the management issues associated with each designation and site.</p>	<p>to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>



Responses to Question 30

ID	Full Name	Response to question 30 - Are there any buildings of significance in your local community which should be included on a local heritage list?	Officer Response	Officer Action Points
LPIO_488	Anthony Newell	Palmers College and Tilbury cruise terminal Landing stage.	Comments noted. The Local Plan will have a key role to play in providing an appropriate planning policy framework to safeguard and enhance the Boroughs built, natural and historic environment. The Council has commissioned an update of the evidence base to ensure that the Local Plan achieves the objectives through the proper identification of Thurrock's built, natural and historic assets and the management issues associated with each designation and site.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_521	Daphne Revell	Sleepers Farm House on Chadwell Hill. it is falling seriously into disrepair & is a major part of Chadwell St Marys Village Centre. i.e. Church, Pub School (Now the library/& Farmhouse. Funding must be found to rescue this building urgently.	Comments noted. The Local Plan will have a key role to play in providing an appropriate planning policy framework to safeguard and enhance the Boroughs built, natural and historic environment. The Council has commissioned an update of the evidence base to ensure that the Local Plan achieves the objectives through the proper identification of Thurrock's built, natural and historic assets and the management issues associated with each designation and site.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_408	Historic England (Michael Stubbs)	Historic England would draw attention to its guidance on local designations, which can be accessed at <a href="https://historicengland.org.uk/listing/what-is-designation/local/">https://historicengland.org.uk/listing/what-is-designation/local/</a>	Comments noted. The Local Plan will have a key role to play in providing an appropriate planning policy framework to safeguard and enhance the Boroughs built, natural and historic environment. The Council has commissioned an update of the evidence base to ensure that the Local Plan achieves the objectives through the proper identification of Thurrock's built, natural and	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

ID	Full Name	Response to question 30 - Are there any buildings of significance in your local community which should be included on a local heritage list?	Officer Response	Officer Action Points
			historic assets and the management issues associated with each designation and site.	
LPIO_446	South Ockendon Centre (Wendy Curtis)	Belhus Manor	Comments noted	No further action.

Responses to Question 31

Comment ID	Consultee Details	Response to question 31 - What approach should the Local Plan take to ensure that Borough's landscape, seascape and its key features are protected and where possible enhanced?	Officer Response	Officer Action Points
LPIO_489	Anthony Newell	Protect from exploitation by developers.	Comments noted. The Local Plan will have a key role to play in providing an appropriate planning policy framework to safeguard and enhance the Boroughs built, natural and historic environment. The Council has commissioned an update of the evidence base to ensure that the Local Plan achieves the objectives through the proper identification of Thurrock's built, natural and historic assets and the management issues associated with each designation and site.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_522	Daphne Revell	Green Belt should be sacrosanct & preserved at all costs. Thurrock has a large agricultural Farming community & grade 1 agricultural land. We need to feed our ever expanding population by this land. Also large areas of this land are the sites also contain Neolithic, Roman & Bronze Age artefacts.	Comments noted. The Council has commissioned the preparation of a Borough Wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_158	Essex Bridleways Association (Sue Dobson)	The Core Strategy promotes the need to create a multi-functional landscape and this we support in that access for as many user groups as possible should be the norm where practicable.	Support noted. The Council is preparing a new Active Place Strategy which will identify proposals to improve the nature, quality and provision of leisure and recreational facilities across the whole of Thurrock. The	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin

Comment ID	Consultee Details	Response to question 31 - What approach should the Local Plan take to ensure that Borough's landscape, seascape and its key features are protected and where possible enhanced?	Officer Response	Officer Action Points
			Strategy which is being prepared jointly with Sport England will also identify priorities for funding and will help inform the preparation of the Local Plan including policies to protect open space, including football pitches, from development and to obtain additional funding from developers to maintain and enhance both new and existing leisure opportunities.	the preparation of a sound and deliverable local plan.
LPIO_300	Gladman Developments Ltd (Phil Bamford)	Q31 and 32. Gladman consider that any local environmental designations and landscape designations must be predicated on a robust and comprehensive evidence base that can be used in the planning balance exercise advocated by the Framework, allowing the Council to assess whether the adverse impacts of the loss of such areas significantly and demonstrably outweigh the benefits of delivering the full need for housing. 6.3.12 Policies that represent a blanket approach to development outside of the defined settlement policy boundaries do not accord with the presumption in favour of sustainable development set out in the Framework. Any policy for the protection and enhancement of the environment should be established in light of the national policies contained in the Framework, particularly paragraphs 109 to 125. 6.3.13 Para 109 sets out that the planning system should contribute to and enhance valued landscapes with advice in Para 113 stating that Local Planning Authorities should set criteria based policies against which proposals for any development on or affecting such sites should be judged. In addition, Para 113 highlights that distinctions should be made between the hierarchy of international, national and locally designated sites so that protections are commensurate with their status.	Comments noted. The Local Plan will have a key role to play in providing an appropriate planning policy framework to safeguard and enhance the Boroughs built, natural and historic environment. The Council has commissioned an update of the evidence base to ensure that the Local Plan achieves the objectives through the proper identification of Thurrock's built, natural and historic assets and the management issues associated with each designation and site.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_409	Historic England (Michael Stubbs)	Historic England would draw attention to its guidance on The Setting of Heritage Assets and conservation principles, which are of relevance to such studies. <a href="https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/">https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/</a> <a href="https://historicengland.org.uk/advice/constructive-conservation/conservation-principles/">https://historicengland.org.uk/advice/constructive-conservation/conservation-principles/</a>	Comments noted. The Local Plan will have a key role to play in providing an appropriate planning policy framework to safeguard and enhance the Boroughs built, natural and historic environment. The Council has commissioned an update of the evidence base to ensure that the Local Plan achieves the objectives through the proper identification of	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

Comment ID	Consultee Details	Response to question 31 - What approach should the Local Plan take to ensure that Borough's landscape, seascape and its key features are protected and where possible enhanced?	Officer Response	Officer Action Points
			Thurrock's built, natural and historic assets and the management issues associated with each designation and site.	
LPIO_26	Lawson Planning Partnership Ltd (Jenny Moor)	It is acknowledged that there will be a requirement to assess any development proposal for the site in terms of potential impact on the local landscape and it is considered that a high quality and well planned development in the proposed location at Orsett will not have a detrimental impact on the local landscape. The Councils intention to prepare an updated Landscape and Seascape Character and Capacity Assessment is supported and any proposals will be developed in accordance with the results of such an assessment.	Comments Noted. The Local Plan will have a key role to play in providing an appropriate planning policy framework to safeguard and enhance the Boroughs built, natural and historic environment. The Council has commissioned an update of the evidence base to ensure that the Local Plan achieves the objectives through the proper identification of Thurrock's built, natural and historic assets and the management issues associated with each designation and site.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_185	Local Access Forum (Sue Dobson)	The Core Strategy promotes the need to create a multi-functional landscape and this we support in that access for as many user groups as possible should be the norm where practicable.	Comments noted. The Council is preparing a new Active Place Strategy which will identify proposals to improve the nature, quality and provision of leisure and recreational facilities across the whole of Thurrock. The Strategy which is being prepared jointly with Sport England will also identify priorities for funding and will help inform the preparation of the Local Plan including policies to protect open space, including football pitches, from development and to obtain additional funding from developers to maintain and enhance both new and existing leisure opportunities.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_393	Natural England (Jamie Melvin)	Natural England expects the Plan to include strategic policies to protect and enhance valued landscapes, as well criteria based policies to guide development, as set out in the National Planning Policy Framework (NPPF), The Local Plans policies and proposals should be informed by National Character Areas (NCAs). NCAs divide England into 159 distinct natural areas. Each is defined by a unique combination of landscape,	Comments noted. The Thurrock Local Plan will continue to contribute to the achievement of sustainable development including protecting and enhancing the natural to ensure that its natural characteristics are maintained and made use of where possible. This will examine	

<b>Comment ID</b>	<b>Consultee Details</b>	<b>Response to question 31 - What approach should the Local Plan take to ensure that Borough's landscape, seascape and its key features are protected and where possible enhanced?</b>	<b>Officer Response</b>	<b>Officer Action Points</b>
		biodiversity, geodiversity and cultural and economic activity.	landscape, biodiversity, geodiversity and cultural and economic activity. The Council remains committed to the achievement of Sustainable Development. Policies will be developed to protect and enhance valued landscapes, as well criteria based policies to guide development, as set out in the National Planning Policy Framework (NPPF).	
LPIO_125	Port of London Authority (Helena Payne)	Landscape It is noted from the consultation documentation that the Borough has a number of valued open spaces, including adjacent to the river, and a number of key challenges and objectives have been considered, including the need to enhance the Boroughs distinctive landscape in this areas, which the PLA would seek to encourage. In response to questions 31 and 32 of the consultation documents, the Borough could consider the promotion and preservation of its riverside landscape in conjunction with the Thames Vision, and ensure that its natural characteristics and maintained and made use of where possible. Given the importance of the River to the Borough, it is considered important to continue to protect and enhance these open and natural spaces through the policies in the new Local Plan, this would also assist in the need for nature conservation	Comments noted. The Council recognises the importance of the River Thames in contributing to the future economic growth and development of Thurrock. The issues raised by the respondent will be considered by the South Essex Economic Development Needs Assessment (SE EDNA) and the Thurrock Employment Land Availability Assessment (ELAA)	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.

### Responses to Question 32

<b>Comment ID</b>	<b>Consultee Details</b>	<b>Response to question 32 - How should the Local Plan use the information from the landscape and seascape capacity and sensitivity study?</b>	<b>Officer Response</b>	<b>Officer Action Points</b>
LPIO_523	Daphne Revell	Thurrock is unique in that it is composed of separate village community areas, Chadwell. Orsett, E. Tilbury, W Tilbury, Tilbury, Stanford, Purfleet, Aveley with agricultural land in-between as lungs & greenery. this uniqueness should be retained by all measures. We do not want it to all be concreted over and a huge London Southend conglomeration created.	Comments noted. The Local Plan will have a key role to play in providing an appropriate planning policy framework to safeguard and enhance the Boroughs built, natural and historic environment. The Council has commissioned an update of the evidence base to ensure that the Local Plan achieves the objectives through	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.



Comment ID	Consultee Details	Response to question 32 - How should the Local Plan use the information from the landscape and seascape capacity and sensitivity study?	Officer Response	Officer Action Points
			the proper identification of Thurrock's built, natural and historic assets and the management issues associated with each designation and site.	
LPIO_159	Essex Bridleways Association (Sue Dobson)	To gauge the practicality of increased access to the Borough's open spaces and the creation of new off road routes for all.	Comments noted. The Council is preparing a new Active Place Strategy which will identify proposals to improve the nature, quality and provision of leisure and recreational facilities across the whole of Thurrock. The Strategy which is being prepared jointly with Sport England will also identify priorities for funding and will help inform the preparation of the Local Plan including policies to protect open space, including football pitches, from development and to obtain additional funding from developers to maintain and enhance both new and existing leisure opportunities.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_69	Historic England (Michael Stubbs)	Historic England would draw attention to its guidance on The Setting of Heritage Assets and conservation principles, which are of relevance to such studies. <a href="https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf">https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf</a> <a href="https://historicengland.org.uk/advice/constructive-conservation/conservation-principles/">https://historicengland.org.uk/advice/constructive-conservation/conservation-principles/</a> Question 32 How should the Local Plan use the information from the landscape and seascape capacity and sensitivity study? The Council have a detailed base of evidence that supported the Core Strategy when examining rural and historic landscapes. Characterisation work was undertaken in the Core Strategy evidence base and Historic England would support a review and updating of this work as a further development of the evidence base. In line with the NPPF great weight will need to be given to the conservation of scheduled monuments of the highest significance as fall within this area.	Comments noted. The Local Plan will have a key role to play in providing an appropriate planning policy framework to safeguard and enhance the Boroughs built, natural and historic environment. The Council has commissioned an update of the evidence base to ensure that the Local Plan achieves the objectives through the proper identification of Thurrock's built, natural and historic assets and the management issues associated with each designation and site.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development
LPIO_410	Historic England (Michael Stubbs)	The Council have a detailed base of evidence that supported the Core Strategy when examining rural and historic landscapes. Characterisation work was undertaken in the Core Strategy evidence base and	Comments noted. The Local Plan will have a key role to play in providing an appropriate planning policy framework to	The Council will arrange a meeting with the respondent to discuss their representations and to agree

Comment ID	Consultee Details	Response to question 32 - How should the Local Plan use the information from the landscape and seascape capacity and sensitivity study?	Officer Response	Officer Action Points
		Historic England would support a review and updating of this work as a further development of the evidence base. In line with the NPPF great weight will need to be given to the conservation of scheduled monuments of the highest significance as fall within this area.	safeguard and enhance the Boroughs built, natural and historic environment. The Council has commissioned an update of the evidence base to ensure that the Local Plan achieves the objectives through the proper identification of Thurrock's built, natural and historic assets and the management issues associated with each designation and site.	next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_27	Lawson Planning Partnership Ltd (Jenny Moor)	The results of the Landscape and Seascape Character and Capacity Assessment would assist in the preparation of a scheme on our clients site and would ensure the development represents a positive contribution to, or enhancement of, the character of the local area.	Comments Noted. The Local Plan will have a key role to play in providing an appropriate planning policy framework to safeguard and enhance the Boroughs built, natural and historic environment. The Council has commissioned an update of the evidence base to ensure that the Local Plan achieves the objectives through the proper identification of Thurrock's built, natural and historic assets and the management issues associated with each designation and site.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_186	Local Access Forum (Sue Dobson)	To gauge the practicality of increased access to the Boroughs open spaces and the creation of new off road routes for all.	Comments noted. The Council is preparing a new Active Place Strategy which will identify proposals to improve the nature, quality and provision of leisure and recreational facilities across the whole of Thurrock. The Strategy which is being prepared jointly with Sport England will also identify priorities for funding and will help inform the preparation of the Local Plan including policies to protect open space, including football pitches, from development and to obtain additional funding from developers to maintain and enhance both new and existing leisure opportunities.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.

<b>Comment ID</b>	<b>Consultee Details</b>	<b>Response to question 32 - How should the Local Plan use the information from the landscape and seascape capacity and sensitivity study?</b>	<b>Officer Response</b>	<b>Officer Action Points</b>
LPIO_347	Miller Strategic Land Via MRPP (Richard Robeson)	The Council should use the outcome of this work to categorise the Borough's landscape and to help identify broad areas where new development is likely to be less sensitive. Notwithstanding the clear differences between the policies and objectives relating to landscape and Green Belt, it is regrettable that the Landscape Assessment is being undertaken in the absence of a full Green Belt Review, which would otherwise afford the opportunity to review the landscape impacts of targeted locations for potential GB release.	Comments welcomed. The Council will work in partnership with the respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Council's obligations under the Duty to Cooperate.
LPIO_394	Natural England (Jamie Melvin)	Landscape and Seascape Character Assessments of the plan area should assist in the selection of locations for development which involve the least harm to landscape character and guide policies on the design of development.	Comments noted. The Local Plan will have a key role to play in providing an appropriate planning policy framework to safeguard and enhance the Borough's built, natural and historic environment. The Council has commissioned an update of the evidence base to ensure that the Local Plan achieves the objectives through the proper identification of Thurrock's built, natural and historic assets and the management issues associated with each designation and site.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_126	Port of London Authority (Helena Payne)	Landscape It is noted from the consultation documentation that the Borough has a number of valued open spaces, including adjacent to the river, and a number of key challenges and objectives have been considered, including the need to enhance the Borough's distinctive landscape in these areas, which the PLA would seek to encourage. In response to questions 31 and 32 of the consultation documents, the Borough could consider the promotion and preservation of its riverside landscape in conjunction with the Thames Vision, and ensure that its natural characteristics are maintained and made use of where possible. Given the importance of the River to the Borough, it is considered important to continue to protect and enhance these open and natural spaces through the policies in the new Local Plan, this would also assist in the need for nature conservation.	Comments noted. The Council recognises the importance of the River Thames in contributing to the future economic growth and development of Thurrock. The issues raised by the respondent will be considered by the South Essex Economic Development Needs Assessment (SE EDNA) and the Thurrock Employment Land Availability Assessment (ELAA).	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.

Responses to Question 33

Comment ID	Consultee Details	Response to question 33 - What approach should the Local Plan take to ensure that Borough's natural assets are protected and where possible enhanced?	Officer Response	Officer Action Points
LPIO_285	Environment Agency (Lizzie Griffiths)	<p>There is a great emphasis on encouraging the use of brownfield sites within the Plan. However, there is little or no reference to ensuring the water environment is improved by encouraging appropriate regeneration of these sites. We agree that the Local Plan will be critical to ensure the right infrastructure is in place to accommodate future growth. Waste water treatment and the quality of the water environment should be addressed in the Local Plan to ensure there is infrastructure to support sustainable growth and ensure there is no deterioration of water quality. We are pleased that waste water infrastructure is referenced in the Utilities section. Local Plan policies should encourage all developments to connect to the public sewerage system rather than allowing a proliferation of private treatment plants. If capacity is an issue and any upgrades are likely to be needed to accommodate growth, the council should check that water quality improvement schemes can be included in Asset Management Plan business plan delivery for the appropriate periodic review. Despite the push for brownfield land to be developed over greenfield sites, there should be an acknowledgement that some brownfield sites can be of high ecological importance. In particular, they can be high value for invertebrates (such as shrill carder-bee) and open mosaic habitats, and new development will need to avoid or mitigate any adverse impacts. This section should include a mention of protected species and priority species/habitats. Although it is mentioned elsewhere, this section also has no mention of Water Framework Directive (WFD). The Local Plan needs to incorporate WFD as an integral part of the planning process, ensuring no deterioration in ecological status/potential as an absolute minimum and, wherever possible, enhancements should be sought. Natural flood management options (creating wetlands, planting trees etc.) should be sought where new developments are on the floodplain/adjacent to rivers. The WFD, through the River Basin Management Plans, sets out the environmental objectives which will need to be met for surface and ground water bodies. Guidance has been produced that provides useful advice on how planning can help meet WFD objectives Planning Advice for Integrated Water Management. It is strongly recommended that the RBMP forms part of the evidence base for the Plan. We</p>	<p>Comments welcomed. The Council will work in partnership with the respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.</p>

Comment ID	Consultee Details	Response to question 33 - What approach should the Local Plan take to ensure that Borough's natural assets are protected and where possible enhanced?	Officer Response	Officer Action Points
		would encourage equal regard for the aquatic environment as there currently is for the terrestrial environment and the inclusion and commitment to help deliver measures included within the 2RBMP through the planning application process or partnership works with ourselves, local wildlife trusts and other stakeholders. In addition, we would encourage you to sign up for the Data Share service, registering as a WFD Co-deliverer, to access data on local waterbodies: <a href="http://www.geostore.com/environment-agency/">http://www.geostore.com/environment-agency/</a>		
LPIO_160	Essex Bridleways Association (Sue Dobson)	To gauge the practicality of increased access to the Borough's open spaces and the creation of new off road routes for all.	Comments noted. The Council is preparing a new Active Place Strategy which will identify proposals to improve the nature, quality and provision of leisure and recreational facilities across the whole of Thurrock. The Strategy which is being prepared jointly with Sport England will also identify priorities for funding and will help inform the preparation of the Local Plan including policies to protect open space, including football pitches, from development and to obtain additional funding from developers to maintain and enhance both new and existing leisure opportunities.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.
LPIO_228	Essex County Council (Lesley Stenhouse)	The River Thames and the potential for a strategic level policy, which would require a comprehensive assessment of the landscape and green spaces as part of a wider green and blue (rivers, estuary) network. Such a policy could highlight the multifunctional role of these green spaces for biodiversity, recreation, amenities connection, surface water management and climate change adaptation. The policy could require that all new development proposals create and enhance green spaces and try to link together green networks where appropriate, whilst protecting this environment. Any proposals should look to enhance green open spaces and corridors to contribute positively to the landscape and visual amenity value (i.e. health and wellbeing benefits, sustainable travel and potential tourism) of the green space There may be the need to increase the resilience of ecosystems to the impacts of climate change, which will help the widest	1. Comments noted. 2. The Council is preparing a new Active Place Strategy which will identify proposals to improve the nature, quality and provision of leisure and recreational facilities across the whole of Thurrock. The Strategy which is being prepared jointly with Sport England will also identify priorities for funding and will help inform the preparation of the Local Plan including policies to protect open space, including football pitches, from development and to obtain	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.



Comment ID	Consultee Details	Response to question 33 - What approach should the Local Plan take to ensure that Borough's natural assets are protected and where possible enhanced?	Officer Response	Officer Action Points
		<p>range of biodiversity to survive and adapt. Through assessing the vulnerability of biodiversity and associated ecosystem goods and services will help to identify priorities and develop appropriate actions, such as: Conserve range and ecological variability of habitats and species will increase the chances that species whose current habitat becomes inhospitable will be able to spread locally into newly favourable habitat. Maintain existing ecological networks -further habitat fragmentation and isolation should be avoided. The specific measures associated with enhancing biodiversity adaptation to climate change will generate social, economic and cultural co-benefits as well as reduce the negative effects of climate change (i.e. absorb CO2, reduce flooding), which can be advocated through a Green Infrastructure approach to development planning and conservation. These may include green/brown roofs, SUDs and the creation of green corridors for wildlife. Therefore, new development proposals should incorporate climate change adaptation measures through the use of green infrastructure (i.e. incorporate biodiversity or geological features into the design as far as possible). Ecology and Biodiversity: The following Ecology comments apply to this question and should be read as ECCs ecological comments in response to Questions 1 and 9 concerning the Vision and Brownfield sites. Thurrock Council may wish to consider the inclusion of ecology within the vision, to recognise potential and contribution of ecology, priority habitats and links to brownfield sites, with high biodiversity and ecology value, as well as their contribution to Green Infrastructure such as Sustainable Drainage Systems. Priority habitats and species/ brownfield sites: The Plan should include specific reference to priority habitats and species. Please note that the UK Post-2010 Biodiversity Framework has replaced the UK Biodiversity Action Plan (UKBAP); and UKBAP species and habitats should now be referred to as Species of Principal Importance and Habitats of Principal Importance under section 41 of the Natural Environment and Rural Communities Act 2006. The Framework uses the simplified term: 'Priority Species or Habitats'. In relation to this, your attention is drawn to the issue of developing brownfield sites. Some of Thurrock's brownfield sites are extremely important for biodiversity. In particular, the Thames Terrace Grasslands that have developed on them, for which south Essex- including Thurrock- is particularly important. The terrace sands and gravels that overlook the Thames marshes, and stretch south from the A13, support a wide variety of</p>	<p>additional funding from developers to maintain and enhance both new and existing leisure opportunities.</p>	



Comment ID	Consultee Details	Response to question 33 - What approach should the Local Plan take to ensure that Borough's natural assets are protected and where possible enhanced?	Officer Response	Officer Action Points
		<p>invertebrate-rich terrestrial habitats. The Shrill Carder Bee, Brown-banded Carder Bee, Four-banded Weevil Wasp and Fancy-legged Fly are among some of the charismatic species, which have nationally significant strongholds in south Essex. Since the middle of the 20th century, there has been a significant loss of semi-natural Thames Terrace habitat that supports these rare species, and the brownfield sites that have largely replaced their natural habitats are increasingly under threat from development. Over the last decade considerable work has been undertaken to better understand their habitat requirements, and to implement measures to re-create Thames Terrace habitat; most recently as part of the Greater Thames Marshes Nature Improvement Area (NIA). Brownfield land of high biodiversity value is classed as Open Mosaic Habitats on Previously Developed Land please see page 49 of UKBAP - Priority Habitat Descriptions Dec 2011. This is a priority habitat (also referred to as a Habitats of Principal Importance) which is included in the England Biodiversity List published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006. Mitigation hierarchy: ECC recommend the approach to biodiversity mitigation hierarchy is consistent with the NPPF to ensure it is considered strategically at the Local Plan stage, as well as at the development management stage. Essex County Councils Biodiversity Validation Checklist: Proposals will be subject to further strategic and project level assessment and this should be in accordance with best-practice guidelines. The link below is to ECCs Biodiversity Validation Checklist which provides a useful guide to relevant legislation and best-practice: <a href="http://www.placeservices.co.uk/projects/essex-biodiversity-validation-checklist-toolkit/">http://www.placeservices.co.uk/projects/essex-biodiversity-validation-checklist-toolkit/</a>, Sustainable Drainage: ECC would encourage the Council to seek to enhance biodiversity and the environment by providing at-surface Sustainable Urban Drainage System (SUDs) solutions which promote habitats for wildlife and opportunities for biodiversity enrichment. Additional ecological information is incorporated into ECC SuDS Design Guide. Please also refer to the Ecology comments raised under Question 3 which equally applies to this Question 9 regarding Brownfield land, and to Question 33 regarding Nature conservation.</p>		
LPIO_537	George Watts	Be more insistent about the protection of our ordinary historic sites, promote (exploit) the history of the many famous people who have lived here e.g. where is the	Comments Noted. The Local Plan will have a key role to play in providing an appropriate	The Council will arrange a meeting with the respondent to discuss their

<b>Comment ID</b>	<b>Consultee Details</b>	<b>Response to question 33 - What approach should the Local Plan take to ensure that Borough's natural assets are protected and where possible enhanced?</b>	<b>Officer Response</b>	<b>Officer Action Points</b>
		statue of Alfred Russel Wallace Conrad. Promoting the borough and earning income from say of military heritage and town trails could be cheaply set up. All decision makers should demand of designers and architects the highest standards in any aspect of planning second best is not acceptable any more. Let's all repeat time and time again Thurrock's time has come!!! My old school has a motto Aim High and that's what I would like to see our Civic and Business leaders doing in our maligned borough.	planning policy framework to safeguard and enhance the Boroughs built, natural and historic environment. The Council has commissioned an update of the evidence base to ensure that the Local Plan achieves the objectives through the proper identification of Thurrock's built, natural and historic assets and the management issues associated with each designation and site.	representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_70	Historic England (Michael Stubbs)	The Council have a detailed base of evidence that supported the Core Strategy when examining rural and historic landscapes. Characterisation work was undertaken in the Core Strategy evidence base and Historic England would support a review and updating of this work as a further development of the evidence base. In line with the NPPF great weight will need to be given to the conservation of scheduled monuments of the highest significance as fall within this area.	Comments Noted. The Local Plan will have a key role to play in providing an appropriate planning policy framework to safeguard and enhance the Boroughs built, natural and historic environment. The Council has commissioned an update of the evidence base to ensure that the Local Plan achieves the objectives through the proper identification of Thurrock's built, natural and historic assets and the management issues associated with each designation and site.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_28	Lawson Planning Partnership Ltd (Jenny Moor)	The importance of protecting and, where possible, enhancing the Boroughs natural assets is acknowledged and any development will be designed to ensure it does not adversely impact on such assets.	Comments Noted. The Local Plan will have a key role to play in providing an appropriate planning policy framework to safeguard and enhance the Boroughs built, natural and historic environment. The Council has commissioned an update of the evidence base to ensure that the Local Plan achieves the objectives through the proper identification of Thurrock's built, natural and historic assets and the management issues associated with each designation and site.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_358	Medway Council	Medway Council would welcome opportunities for strategic planning for the natural environment at a	Comments Noted. The Local Plan will have a key role to play	The Council will arrange a meeting with the respondent

Comment ID	Consultee Details	Response to question 33 - What approach should the Local Plan take to ensure that Borough's natural assets are protected and where possible enhanced?	Officer Response	Officer Action Points
	(Catherine Smith)	landscape scale, particularly across the Thames Estuary.	in providing an appropriate planning policy framework to safeguard and enhance the Boroughs built, natural and historic environment. The Council has commissioned an update of the evidence base to ensure that the Local Plan achieves the objectives through the proper identification of Thurrock's built, natural and historic assets and the management issues associated with each designation and site.	to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_395	Natural England (Jamie Melvin)	Regarding section 3.88 it is unclear what specific protection wildlife corridors and habitat chains/cluster have or why these are regarded as having greater protection than local wildlife sites. We would also welcome reference to Nature Improvement Areas and an acknowledgement that designations outside of the district will also need to be considered. We welcome recognition of the environmental value of some brownfield sites and the intention to seek net gains for the environment wherever possible. The Local Plan should set criteria based policies to ensure the protection of designated biological and geological sites. Such policies should clearly distinguish between international, national and local sites <sup>2</sup> . Natural England advises that all relevant Sites of Special Scientific Interest (SSSIs), European sites (Special Areas of Conservation and Special Protection Areas) and Ramsar sites <sup>3</sup> should be included on the proposals map for the area so they can be clearly identified in the context of proposed development allocations and policies for development. Designated sites should be protected and, where possible, enhanced. The Local Plan should be screened under Regulation 102 of the Conservation of Habitats and Species Regulations 2010 (as amended) at an early stage so that outcomes of the assessment can inform key decision making on strategic options and development sites. It may be necessary to outline avoidance and/or mitigation measures at the plan level, including a clear direction for project level HRA work to ensure no adverse effect on the integrity of internationally designated sites. It may also be necessary for plans to provide policies for strategic or cross boundary approaches, particularly in areas where designated sites cover more than one Local Planning	Comments Noted. The Local Plan will have a key role to play in providing an appropriate planning policy framework to safeguard and enhance the Boroughs built, natural and historic environment. The Council has commissioned an update of the evidence base to ensure that the Local Plan achieves the objectives through the proper identification of Thurrock's built, natural and historic assets and the management issues associated with each designation and site.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

Comment ID	Consultee Details	Response to question 33 - What approach should the Local Plan take to ensure that Borough's natural assets are protected and where possible enhanced?	Officer Response	Officer Action Points
		<p>Authority boundary. Natural England would welcome early discussion on the Habitats Regulations Assessment (HRA) of the plan and can offer further advice as policy options are progressed. The Magic website is a useful source of information on the location and qualifying features of the international and national designations. Natural England's Impact Risk Zones, relating to designated sites, is another useful tool to identify risks associated with different types of development. Local Environmental Records Centres should also be of assistance and often hold information on Local Wildlife Sites. The Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity. There should be consideration of geodiversity conservation in terms of any geological sites and features in the wider environment. A strategic approach for networks of biodiversity should support a similar approach for green infrastructure. New development should incorporate opportunities to enhance biodiversity, wherever possible.</p>		
LPIO_174	Port of Tilbury (Perry Gladding) Via Vincent and Gorbing (Hannah Philips)	<p>It is important to ensure that the Plan positively addresses the natural assets of the Borough. This should be achieved by highlighting those areas of most value through up-to-date survey. The designation of any land for its biodiversity value must be undertaken on an evidential basis with such evidence being balanced against the overall objectives of the plan and alternative uses of the land. Compared to previous plans, it is considered that the new Local Plan should be simpler and easier to interpret in this regard. The imposition of a number of inter-related designations such as Green Grid, Green Infrastructure, Green Chains etc., the meaning of which is not always entirely clear, should be reviewed.</p>	<p>Comments noted. The Council is preparing a new Active Place Strategy which will identify proposals to improve the nature, quality and provision of leisure and recreational facilities across the whole of Thurrock. The Strategy which is being prepared jointly with Sport England will also identify priorities for funding and will help inform the preparation of the Local Plan including policies to protect open space, including football pitches, from development and to obtain additional funding from developers to maintain and enhance both new and existing leisure opportunities.</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound and deliverable local plan.</p>
LPIO_467	Vivian Humphry	<p>Huge fines for anyone caught harming the environment.</p>	<p>Comments noted.</p>	<p>No further action.</p>

**Responses to Question 34**

<b>Comment ID</b>	<b>Consultee Details</b>	<b>Response to question 34 - How much weight should the Local Plan give to flood risk relative to other objectives?</b>	<b>Officer Response</b>	<b>Officer Action Points</b>
LPIO_490	Anthony Newell	Having regards to our unpredictable weather due to climate change. The recent flooding on large scale in parts of the country I would assume the risk of flooding is a serious issue.	Comment noted.	No action.
LPIO_449	David Pasterfield	A lot.	Comment noted.	No action.
LPIO_286	Environment Agency (Lizzie Griffiths)	Local Plans can help to ensure that new developments are resilient over their lifetime and help improve the sustainability of existing communities. Managing flood risk and coastal change can also improve the economic prospects of communities and improve the environment. Flood Risk Evidence Base Further evidence to be used is highlighted below: In March 2016 we published the Thames river basin district flood risk management plan (FRMP). The flood risk management plans explain the risk of flooding from rivers, the sea, surface water, groundwater and reservoirs and set out how risk management authorities will work with communities to manage flood risk over the next 6 years. The Thames region FRMP can be found buy using the following link <a href="https://www.gov.uk/government/publications/thames-river-basin-district-flood-risk-management-plan">https://www.gov.uk/government/publications/thames-river-basin-district-flood-risk-management-plan</a> The Thames Estuary 2100 Plan (TE2100) was published in November 2012, setting out our recommendations for flood risk management for London and the Thames Estuary through to the end of the century and beyond. The Local Plan should refer to the relevant policy units under the Thames Estuary 2100 Plan, in particular Action Zone 0 and Action Zone 6. Any approaches to managing surface water flood risk should be discussed within your council, in its role as the Lead Local Flood Authority. There is a new evidence base being developed at the moment, but not published. For awareness, this is the emerging Tilbury Integrated Urban Drainage model led by Thurrock Council and supported by Anglian Water and ourselves. We would encourage further discussion with us regarding all points highlighted and welcome the opportunity to be involved with development of all strategic documents within Thurrock. Flood Defences Any new proposals relating to flood defence schemes should draw on the guidelines highlighted in the attached documents. Whatever work is required regarding defences to keep communities sustainable, affordability is a big issue for defences and it will be essential going forwards that we will require funding partners to deliver outcomes. We would also encourage consideration of the early engagement of other	The Council welcomes the advice of the Environment Agency and these comments will be carried forward to inform the review of the Thurrock Local Plan.	Ensure that's the points raised are appropriately considered in the Plans preparation.



Comment ID	Consultee Details	Response to question 34 - How much weight should the Local Plan give to flood risk relative to other objectives?	Officer Response	Officer Action Points
		<p>stakeholders for contributions for the funding of future defence costs to protect existing communities. Please see the following links and attached document for more information and guidance on partnership funding.</p> <p><a href="https://www.gov.uk/government/collections/flood-and-coastal-defence-funding-for-risk-management-authorities">https://www.gov.uk/government/collections/flood-and-coastal-defence-funding-for-risk-management-authorities</a>  <a href="https://www.gov.uk/government/publications/flood-and-coastal-resilience-partnership-funding-an-introductory-guide">https://www.gov.uk/government/publications/flood-and-coastal-resilience-partnership-funding-an-introductory-guide</a>  <a href="https://www.gov.uk/government/publications/flood-and-coastal-resilience-partnership-funding">https://www.gov.uk/government/publications/flood-and-coastal-resilience-partnership-funding</a></p> <p>Any allocations should be subject to the Sequential Test at the earliest stages to ensure that new development is steered away from higher risk areas for flood risk. Within larger sites that fall across flood zones, a sequential approach should be applied to inform site layout to keep more vulnerable development in lower risk areas of the site and avoid flood risk areas entirely where possible. Where applicable, development in the floodplain will need to pass the Exception Test by demonstrating that it provides wider sustainability benefits to the community that outweigh flood risk. It will also need to be supported by a site-specific flood risk assessment that demonstrates it will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.</p>		
LPIO_229	Essex County Council (Lesley Stenhouse)	ECC as a neighbouring Lead Local Flood Authority consider this to be a cross boundary matter and an opportunity to explore cross boundary issues, and to maintain a joined up approach to flood risk management and this strategy. ECC as a neighbouring Lead Local Flood Authority, recommend the approach to Flood Risk is consistent with the NPPF, based on evidence in the form of Strategic Flood Risk assessments, Surface Water Management Plans as well as Sustainable Drainage Systems.	The Council welcomes the advice of ECC and these comments will be carried forward to inform the review of the Thurrock Local Plan.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_29	Lawson Planning Partnership Ltd (Jenny Moor)	A considerable number of properties in the Borough are at risk of flooding, largely due to the proximity of urban areas to the Thames Estuary. The draft Local Plan consultation document acknowledges that flooding is likely to become a more frequent event due to climate change and therefore it is preferable to find sites in locations not at risk of surface water flooding. Our clients site is located within Flood Zone 1 and therefore is not required to provide significant mitigation measures to support a suitable drainage strategy that could affect the overall viability of the scheme.	Comments noted.	No action.
LPIO_348	Miller	Such matters are broadly guided by policy, in terms of the	Comments noted.	No action.



Comment ID	Consultee Details	Response to question 34 - How much weight should the Local Plan give to flood risk relative to other objectives?	Officer Response	Officer Action Points
	Strategic Land Via MRPP (Richard Robeson)	sequential approach to site selection unless it can be demonstrated that development can be used to reduce the causes and impacts of flooding. Flooding is specifically identified by the NPPF as a policy indicating that development should be restricted.		
LPIO_175	Port of Tilbury (Perry Gladding) Via Vincent and Goring (Hannah Philips)	It is clearly right to give significant weight to the impact of flood risk on the future location of vulnerable uses such as residential development. It is, however, important to ensure a positive approach to addressing flood risk issues in association with economic development, particularly in the areas close to the River Thames where significant growth potential exists. PoTLL have already demonstrated at London Distribution Park, where flood risk was originally seen as an impediment to development, that innovative approaches can be adopted that allow for investment in flood protection infrastructure which reduces risk whilst allowing economic development to proceed. This is clearly a key issue for Thurrock given the potential impact of climate change in the future and the limitations on public spending.	Comments noted.	No action.
LPIO_248	Starcourt Developments Ltd (Brian Cooke) Via Barton Wilmore (Justine Bailey)	In planning for new development, para 99 of the NPPF states that Local Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. Furthermore, para 100 states inappropriate development in areas at risk of flooding should be avoided by directing development away from areas of at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. The findings of the Level 1 SFRA (Scott Wilson, 2009) and PPS25 Sequential Test (Scott Wilson, 2009) conclude that a large majority of development will need to be located in areas of flood risk in order to maintain and regenerate the main urban areas. This will particularly be the case for Grays Urban Area, Purfleet Urban Area, West Thurrock Urban Area and Tilbury Urban Area. As such, the Council have to take a balanced approach when assessing sites. Without the development of land outside of flood zone 1, the Boroughs growth requirements simply cannot be met. Land within control of our client, Land South of Mar Dyke, Purfleet predominately lies within Flood Zones 2 and 3, however the Mar Dyke discharges to the River Thames approximately 1km to the west and part of the site lies within Defended Tidal Flood Zone 3. As such, fluvial and tidal flooding are considered to pose only minor risks to the site. In view of the above, we have taken into account the flood risk of the site and devised a comprehensive	Comments noted.	No action.

Comment ID	Consultee Details	Response to question 34 - How much weight should the Local Plan give to flood risk relative to other objectives?	Officer Response	Officer Action Points
		scheme which seeks to develop solely the south of the site for housing which lies within less vulnerable areas. The site would be provided with a dedicated surface water drainage system which would mitigate against any risk of flooding.		
LPIO_468	Vivian Humphry	Obviously quite a big consideration.	Comment noted.	No action.

## Responses to Question 35

Comment ID	Consultee Details	Response to question 35 - Should the Plan seek to promote higher water efficiency standards by adopting the Government's Optional Technical Housing Standards?	Officer Response	Officer Action Points
LPIO_288	Environment Agency (Lizzie Griffiths)	The Plan should take a holistic catchment-based approach to the water environment. Policies should aim to prevent inappropriate development in the floodplain. New development should be resilient to flooding and provide opportunities to improve river environments. We note the section on Green Infrastructure and Open Space and are pleased that the plan recognises the multi-functional benefits of these spaces. Policies should promote Sustainable Drainage Systems (SuDS) as the first method of surface water disposal and Green Infrastructure as part of this, for example, promoting de-culverting, creation and management of ecological buffer strips and corridors, new wetland areas to help manage flood risk and reduce diffuse pollution, whilst reconnecting people with nature. We recommend you refer to the Biodiversity Planning Toolkit. The Toolkit provides information on the issues to be considered at the forward planning stage, including gathering a sufficient evidence base, biodiversity opportunity mapping, green infrastructure provision, setting spatial biodiversity objectives and targets and identifying potential for biodiversity enhancements.	The Council welcomes the advice of the Environment Agency and these comments will be carried forward to inform the review of the Thurrock Local Plan.	Ensure that's the points raised are appropriately considered in the Plans preparation.
LPIO_230	Essex County Council (Lesley Stenhouse)	The NPPF expects local planning authorities to adopt proactive strategies to adapt to climate change that take full account of water supply and demand considerations. The Planning Practice Guidance gives a summary about the standard and the evidence required - <a href="http://planningguidance.communities.gov.uk/blog/guidance/housing-optional-technical-standards/water-efficiency-standards/">http://planningguidance.communities.gov.uk/blog/guidance/housing-optional-technical-standards/water-efficiency-standards/</a>	Comments noted.	Ensure that's the points raised are appropriately considered in the Plans preparation.
LPIO_301	Gladman Developments Ltd (Phil Bamford)	The Deregulation Bill 2015 specifies that Councils cannot set any additional local technical standards relating to the construction, internal layout or performance of new dwellings other than the nationally described space standard, an optional requirement for water usage and optional requirements for adaptable / accessible dwellings where these are supported by evidence of need and viability. The Council would therefore require detailed and robust evidence if it were to seek to adopt the Government's Optional Technical Housing Standards	Comments noted.	Ensure that's the points raised are appropriately considered in the Plans preparation.
LPIO_235	Home Builders Federation Ltd (James Stevens)	In line with the NPPG the Council will need to demonstrate that there is a need for the tighter water efficiency standard.	Comments noted.	Ensure that's the points raised are appropriately considered in the Plans preparation.
LPIO_62	Industrial Chemicals Ltd Via Lawson Planning Partnership	The decision to include higher water efficiency standards and associated policies within the emerging Local Plan would need to be justified by evidence of need for additional standards over and above those set out in mandatory Building Regulations, as stipulated by the NPPG.	Comments noted.	Ensure that's the points raised are appropriately considered in the Plans preparation.

<b>Comment ID</b>	<b>Consultee Details</b>	<b>Response to question 35 - Should the Plan seek to promote higher water efficiency standards by adopting the Government's Optional Technical Housing Standards?</b>	<b>Officer Response</b>	<b>Officer Action Points</b>
	Ltd (Aarti O'Leary)			
LPIO_30	Lawson Planning Partnership Ltd (Jenny Moor)	The decision to include higher water efficiency standards and associated policies within the emerging Local Plan would need to be justified with evidence of need for additional standards over and above those set out in mandatory Building Regulations, as stipulated by the NPPG. The financial viability of implementing additional standards will also need to be considered. Should the Plan seek to promote higher water efficiency standards, it is requested that the technical documents supporting this are published ahead of the next draft of the emerging Local Plan to ensure that our client can fully assess any implications there may be on the delivery of the site.	Comments noted. The Council has already commissioned a Local Plan and CIL Viability Study to explore the impact policy and infrastructure costs could potentially have on the viability of new developments in the borough. The costs associated with higher water efficiency standards would be tested in this capacity if required.	Ensure that's the points raised are appropriately considered in the Plans preparation.
LPIO_93	Rochford District Council (Natalie Hayward)	Rochford District Council has no specific observations to make about water efficiency, other than to point out that the Optional Technical Housing (paragraph 0.15, dated 27 March 2015) in the Planning Practice Guidance (PPG) emphasise a clear local need to be demonstrated in order to require new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day.	Comments noted.	Ensure that's the points raised are appropriately considered in the Plans preparation.

**Response to Question 36**

<b>Comment ID</b>	<b>Contact Details</b>	<b>Response to question 36 - How should the Local Plan take account of and encourage community owned renewable energy schemes?</b>	<b>Officer Response</b>	<b>Officer Action Points</b>
LPIO_491	Mr Anthony Newell	All new homes to have solar panels Solar panel farms i.e. the one at Dunlion	Comments noted.	No action required.

**Responses to Question 37**

<b>Comment ID</b>	<b>Consultee Details</b>	<b>Responses to question 37 - Which renewable technologies do you think are most suitable for large scale proposals in the Borough?</b>	<b>Officer Response</b>	<b>Officer Action Points</b>
LPIO_114	DP World - London Gateway Via Trevor Hutchinson Planning and Transportation Ltd (Trevor Hutchinson)	More emphasis should be given to the reduction of whole life energy requirements relating to development, so the overall energy requirements are reduced, rather than just focusing on generation of energy by renewables in the operational phase. Additional measures should be identified to facilitate the viable export of renewables to the national grid where surplus to operational requirements	Comments noted.	No action.
LPIO_63	Industrial Chemicals Ltd Via Lawson Planning Partnership Ltd (Aarti O'Leary)	Energy from Waste and Combined Heat and Power Plants have the potential to assist the cost effective generation of power (e.g. electricity) required by major industrial production processes to operate as efficiently as practicable.	Comment noted.	No action.
LPIO_396	Natural England (Jamie Melvin)	The most suitable renewable technology may depend on its location. Any proposal should consider impacts on the environment, particularly on mobile species associated with designated sites. As some renewable technologies occupy only a small percentage of the land designated to them (such as solar or wind) there may also be opportunities to deliver green infrastructure, priority habitat and ecological networks through the selection of the most appropriate technologies and locations.	Comments noted.	No action.
LPIO_176	Port of Tilbury (Perry Gladding) Via Vincent and Gorbing (Hannah Philips)	As highlighted previously, Port of Tilbury has initiated and is supporting a number of renewable technology installations, including the wind turbines within the Port and the Tilbury Green Power facility. There is further potential for wind turbine installations along the river and PoTLL are active in sharing best practice in this regard.	Comments noted.	No action.



Responses to Question 38

Comment ID	Consultee Details	Response to question 38 - How can the Plan ensure that enough minerals are available for development and also protect resources for the future?	Officer Response	Officer Action Points
LPIO_115	DP World - London Gateway Via Trevor Hutchinson Planning and Transportation Ltd (Trevor Hutchinson)	Identify suitable sites and facilities for river based transport of minerals.	Comments noted.	No action.
LPIO_231	Essex County Council (Lesley Stenhouse)	<p>Minerals and waste planning matters are strategic planning matter which extends beyond the administrative boundary of any single authority. Active, ongoing and constructive engagement on such matters with relevant organisations, including neighbouring Minerals and Waste planning Authority such as ECC, will be critical to the delivery of a sound and legally compliant Local Plan. ECC anticipate that the Thurrock Local Plan will be based on a robust evidence base as indicated in response to question 1. Key elements of the delivery of the ambitious growth planned in Thurrock can only be delivered where necessary infrastructure such as future minerals and waste capacity provision has been fully considered. ECC look forward to close working with Thurrock Council, through established forums and any bespoke opportunities. ECCs Minerals Local Plan was adopted in July 2014. The Plan includes site allocations, safeguarding provisions for both mineral resources and infrastructure amongst other development management criteria based policies. A key part of the evidence for the Plan is the Local Aggregate Assessment (2014). The LAA covers Greater Essex, including ECC, Thurrock and Southend on Sea BC unitary authorities. In accordance with the discussion at the East of England Aggregate Working Party meeting in February 2016, an updated LAA will be produced towards the end of 2016. ECC officers will lead preparation of the document, in liaison with Thurrock and Southend-on-Sea Borough Council officers. ECC expects that the LAA (2016) will be a key feature of the evidence supporting the preparation of the Thurrock BC Local Plan. To ensure the steady and adequate supply of minerals to the market, ECC anticipates that the Thurrock Local Plan considers the movement of minerals resources and the importance of infrastructure within and beyond the administrative area of Thurrock. To ensure compliance with the legal and soundness framework for</p>	Comments noted. The Council will work in partnership with the respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.

Comment ID	Consultee Details	Response to question 38 - How can the Plan ensure that enough minerals are available for development and also protect resources for the future?	Officer Response	Officer Action Points
		minerals planning, including the duty to cooperate, key features of the emerging Thurrock Local Plan which may impact Essex would include: Policies supporting safeguarding of mineral resources and infrastructure- including the identification of Mineral Safeguarding Areas; Thorough consideration of prior extraction of minerals on development sites proposed to be included in the Plan for non-mineral uses (such as housing or commercial development); Identification of specific mineral extraction sites to meet requirements identified through the evidence base- including the LAA; Policies to guide the consideration of windfall mineral development throughout the plan period.		
LPIO_397	Natural England (Jamie Melvin)	Barge traffic and dredging can be an issue for overwintering birds (notably at Holehaven Creek SSSI) and the impacts of minerals extraction will need to be properly assessed. That notwithstanding, Natural England recognises that minerals extraction also provides opportunities for environmental gains. East Tilbury Quarry and Thurrock Thameside Nature Park are good examples of where good environmental outcomes have been achieved through positive planning. Selecting sites with least environmental impact and good ecological opportunities will help ensure their deliverability.	The Thurrock Local Plan will continue to contribute to the achievement of sustainable development including protecting and enhancing the natural environment. The Council remains committed to the achievement of Sustainable Development. A minerals and waste plan is being commissioned as part of the Local Plan evidence base, in accordance with national guidance. An integrated Sustainability Appraisal is being commissioned as part of the Local Plan evidence base.	
LPIO_116	North London Waste Planning Authorities (Archie Onslow)	Thank you for inviting the North London boroughs to comment on Thurrock's Local Plan Issues and Options (stage 1) document. Our comments relate to waste and are set out below. The new Local Plan is an opportunity to consider the role of Thurrock in relation to London's waste. We draw your attention to paragraph 044 of the National Planning Practice Guidance on planning for London's waste which says: Given the unique waste needs of London, there is likely to be a need for waste planning authorities surrounding London to take some of London's waste. The Mayor and waste planning authorities in London should engage constructively, actively and on an ongoing basis with other authorities, under the duty to cooperate, to help manage London's waste. □ The North London Boroughs and Thurrock have been engaging on movements of waste between our areas as part of the duty to co-operate. This has taken the	Comments noted. The Council will work in partnership with the respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.

Comment ID	Consultee Details	Response to question 38 - How can the Plan ensure that enough minerals are available for development and also protect resources for the future?	Officer Response	Officer Action Points
		<p>form of exchange of information, meetings, correspondence and consultation on the NLWP. We recently wrote to you on the subject of waste exports from North London to landfill in Thurrock 2017-2032 and look forward to your response. The Issues and Options document states that Thurrock must plan for the management of waste by setting the planning framework for an adequate supply of waste treatment and disposal facilities (para 3.111). We draw your attention to the National Planning Policy for Waste (NPPW) paragraph 3 which states Waste planning authorities should prepare Local Plans which identify sufficient opportunities to meet the identified needs of their area for the management of waste streams. The National Planning Practice Guidance (NPPG) sets out these waste streams in paragraph 13 which states Waste planning authorities should plan for the sustainable management of waste including: Municipal/household, Commercial/industrial, Construction/demolition, Low Level Radioactive, Agricultural, Hazardous, Waste water We hope these comments are helpful and look forward to continuing engagement between our areas.</p>		
LPIO_128	Port of London Authority (Helena Payne)	<p>The River Thames is a strategic transshipment location and a major route for the import and distribution of aggregates including the landing of hard rock and marine dredged aggregate. Paragraph 3.108 emphasises the importance of facilitating the sustainable use of minerals and references the National Policy requirement to include policies relating to the extraction, prior extraction of minerals and for the reclamation and restoration. The PLA considers that the continued promotion in the transportation of minerals and waste by river would aid in achieving these aims and objectives.</p>	<p>Comments noted. The Council will work in partnership with the key stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.</p>	<p>No action.</p>
LPIO_276	QUOD	<p>The Local Plan consultation asks where waste management facilities can be located, designed and operated to minimise impacts on climate change, local amenity for residents, and the natural and built environment. Similar to employment sites, waste management facilities should be located away from existing housing and close to the strategic road network, given the number of truck movements that this use would create. There are sites in the borough, particularly to the west of the borough around Ponds Farm that are available for development and suitable for waste management facilities but within the Green Belt.</p>	<p>Comments noted. The Council has commissioned/ is in the process of commissioning a number of technical studies including an up to date Waste Arising's Study and a Borough wide Green Belt Assessment to inform the preparation of the Local Plan. If additional waste management sites are required these will be assessed in accordance with national policy and in the context of other emerging Local Plan policies.</p>	<p>No action.</p>

Comment ID	Consultee Details	Response to question 38 - How can the Plan ensure that enough minerals are available for development and also protect resources for the future?	Officer Response	Officer Action Points
LPIO_372	Recycled in Orsett Via Icen Projects Ltd (Andrew Gale)	<p>As referenced at para. 142 of the NPPF, minerals are essential to support sustainable economic growth and quality of life. The NPPF stresses the importance of ensuring that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. The NPPF states that minerals planning authorities such as Thurrock Council should plan for a steady and adequate supply of aggregates. In doing so, the NPPF (para. 145) requires minerals planning authorities to prepare an annual Local Aggregate Assessment, either individually or jointly by agreement with another planning authority. This should be based on a rolling average of 10 years sales data and other relevant information. The NPPF also requires local minerals authorities to use landbank of aggregate minerals reserves principally as an indicator of security of aggregate minerals supply, and to indicate the additional provision that needs to be made for new aggregate extraction and alternative supplies with the Local Plan. The landbank should be maintained on a basis of 7 years for sand and gravel and 10 years for crush rock. On review of the documents available, it is our view that this key evidence base is currently out of date, and to some extent, absent. The current waste policy within the Thurrock Council Core Strategy (CSTP31) seeks to maintain at least a 7-year landbank of sites to meet the sub-regional apportionment throughout the plan period. Dansand Quarry currently has planning permission to extract Thanet Sand over the next 10 years; it is estimated that the quarry has c.750,000 tonnes of Thanet sand remaining within the site. As demonstrated within the recent planning application submission, Thanet Sand is a goodfill material that compacts down well, thus particularly useful for the building trade. It is evident that in light of the recent planning consent and quantum of resource remaining within the site, that Dansand Quarry should be identified as a Preferred Site for mineral extraction within the new Local Plan. With reference to Preferred Sites, our client encourages Thurrock Council to progress a policy which only permits planning permission for mineral extraction on Preferred Sites. Minerals extraction should be restricted on other sites, and only permitted in very exceptional circumstances where it can be clearly demonstrated that the identified Preferred Sites are unable to meet the Boroughs needs. Part 2 of the current Policy CSTP31 encourages facilities for recycling aggregate or secondary materials across Thurrock. Our</p>	<p>Comments noted. The Council has commissioned/ is in the process of commissioning a number of technical studies including an up to date Waste Arising's Study to inform the preparation of the Local Plan. If additional waste management sites or mineral extraction sites are required these will be assessed in accordance with national policy and in the context of other emerging Local Plan policies.</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>

Comment ID	Consultee Details	Response to question 38 - How can the Plan ensure that enough minerals are available for development and also protect resources for the future?	Officer Response	Officer Action Points
		clients retain the view that existing mineral working locations and waste management facilities should represent the preferred location for such facilities. However, where an existing recycling or processing facility exists, it should not prevent other forms of minerals / waste development, particularly where a permission already exists. It is our view that such an approach would conflict with the principles of sustainable development.		
LPIO_377	Recycled in Orsett Via Icen Projects Ltd (Andrew Gale)	Please refer to the supporting Letter - REF: 13/592 (Comment ID: LPIO_377)	Comments noted. The Council has commissioned/ is in the process of commissioning a number of technical studies including an up to date Waste Arising's Study to inform the preparation of the Local Plan. If additional waste management sites or mineral extraction sites are required these will be assessed in accordance with national policy and in the context of other emerging Local Plan policies.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_94	Rochford District Council (Natalie Hayward)	Rochford District Council has no specific observations to make, but would like to point out that Thurrock, as the Local Planning Authority for minerals and waste in the Borough, should work in conjunction with Essex County Council and Southend Borough Council when planning for minerals, as part of the Duty to Co-operate.	Comments noted.	No action.

Responses to Question 39

Comment ID	Consultee Details	Response to question 39 - What should the Local Plan do to ensure that waste management facilities are located, designed and operated to minimise impacts on climate change, local amenity for residents, and the natural and built environment?	Officer Response	Officer Action Points
LPIO_287	Environment Agency (Lizzie Griffiths)	<p>Previous allowances for climate change for planners were based on climate change projections from 2002. Since then, our understanding of the science has improved and there have been new global assessments of climate change, as well as new UK climate projections from 2009. At the UK level, the main changes are a much more detailed understanding of changes in average rainfall, as well as improvements in the scientific understanding of how different catchments respond. As a result, the changes to the guidance concentrate on fluvial flooding. Sea level and storm allowances have not been changed from the previous version. With regards to Climate change the most up to date information on climate change for planning can be found by using the following link: <a href="https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances">https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances</a>. New development will need to account for this in any submitted FRAs. Improved waste management can contribute to reducing greenhouse gas emissions and can also provide a boost to economic growth through new business opportunities in material recovery and recycling. However, care should be taken in the location of these operations and policies should steer higher risk waste disposal and treatment facilities away from sensitive receptors such as housing and communities. It is important to consider the appropriate location of such sites. Environmentally sensitive sites with respect to the water environment may be a non-starter for such facilities until a more appropriate site is found. Early involvement with us to discuss the appropriateness of a site location is essential. We would be supportive of a policy to address this. New residential developments near, and particularly within 250m of, an existing permitted site can be exposed to impacts such as excessive noise, dust, odour or pests. Where possible, the risks of this should be fully assessed and measures should be considered to reduce the risks to the new development. However, in some cases there may be a limit on the measures that can be employed by an existing facility, or placed on the new development, to adequately reduce the risks, which can result in some amenity issues for occupants of the new development. We consider that a strong policy could restrict new sensitive development (e.g. residential or offices) within 250m of certain permitted activities, such as</p>	<p>Comments noted. The Council will work in partnership with the respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.</p>



Comment ID	Consultee Details	Response to question 39 - What should the Local Plan do to ensure that waste management facilities are located, designed and operated to minimise impacts on climate change, local amenity for residents, and the natural and built environment?	Officer Response	Officer Action Points
		combustion operations, incinerators, composting operations, anaerobic plants, existing landfill operations and intensive pig and poultry installations.		
LPIO_232	Essex County Council (Lesley Stenhouse)	<p>The extant Waste Local Plan was adopted in 2001 and continues to inform the assessment of planning applications in Essex and Southend-on-Sea BC. In partnership with Southend-on-Sea BC, ECC are currently preparing a Replacement Waste Local Plan. The Replacement Waste Local Plan: Pre Submission Draft was published for a 6 week publication which ends on Thursday 14 April. It is proposed that the Plan be submitted to the Secretary of State in June 2016. The new Plan is predicated on the delivery of sustainable waste management through the principle of net self-sufficiency. This means seeking to provide sufficient waste capacity in the Plan area to manage the volume of waste predicted to arise in the plan area, irrespective of the source of the waste. This approach allows for imports/exports of waste across administrative boundaries, but ensures that the net balance of imports/exports is zero. The principle of net self-sufficiency for waste management capacity is being adopted widely, including across the wider East of England. ECC anticipates that Thurrock BC will incorporate this approach as part of the preparation of a Local Plan as this will avoid any undue burden on waste capacity in Essex and further afield. National policy and guidance requires Thurrock BC to consider the wider cross border implications of waste management, with particular reference to the wider South East/London context. ECC anticipates that Thurrock BC will continue as an active participant at the East of England Waste Technical Advisory Body. To ensure compliance with the legal and soundness framework for waste planning, including the duty to cooperate, key features of the emerging Thurrock Local Plan which may impact Essex would include: Policies supporting safeguarding of waste infrastructure; Identification of specific sites suitable for waste development to meet requirements identified through the evidence base- likely to include a bespoke assessment of future waste capacity requirements; Policies to guide the consideration of windfall waste development throughout the plan period.</p>	Comments noted. The Council will work in partnership with the respondent and other stakeholders to ensure that the local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_71	Historic England (Michael	The protection and conservation of the historic environment will be an important factor in locational decisions made in respect of the extraction and the	Comments noted.	No action.

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	Stubbs)	location of waste management facilities. The Council were preparing a development plan document to support the Core Strategy but this was not progressed due to the work on the Local Plan. The updating of characterisation work and landscape character work will be a key part of the evidence base here. As mentioned earlier settings policies should be reviewed in light of Historic England and National Planning Policy Framework (NPPF) policy developments, to strengthen their application. Minerals extraction and waste facilities will need to be appropriately located to avoid adverse impact on the setting of heritage assets.		
LPIO_411	Historic England (Michael Stubbs)	The protection and conservation of the historic environment will be an important factor in locational decisions made in respect of the extraction and the location of waste management facilities. The Council were preparing a development plan document to support the Core Strategy but this was not progressed due to the work on the Local Plan. The updating of characterisation work and landscape character work will be a key part of the evidence base here. As mentioned earlier settings policies should be reviewed in light of Historic England and National Planning Policy Framework (NPPF) policy developments, to strengthen their application. Minerals extraction and waste facilities will need to be appropriately located to avoid adverse impact on the setting of heritage assets.	Comments noted.	No action.
LPIO_64	Industrial Chemicals Ltd Via Lawson Planning Partnership Ltd (Aarti O'Leary)	By identifying sites for waste management facilities that lie within the Boroughs principal employment areas, such as West Thurrock Riverside the allocation of land at West Thurrock Works for waste management facilities is sought, as set out in LPPs accompanying Statement.	Comments noted. The Council has commissioned/ is in the process of commissioning a number of technical studies including an up to date Waste Arising's Study to inform the preparation of the Local Plan. If additional waste management sites or mineral extraction sites are required these will be assessed in accordance with national policy and in the context of other emerging Local Plan policies.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_359	Medway Council (Catherine Smith)	National policy paragraph 142 of NPPF states: Minerals are essential to support sustainable economic growth and our quality of life. It is therefore important that there is a sufficient supply of material to provide the infrastructure,	Comments noted. The Council will work in partnership with the respondent and other stakeholders to ensure that the	The Council will arrange a meeting with the respondent to discuss their representations and to agree

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		buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation. As the safeguarding of mineral supply is important then it is important for Thurrock Council is safeguard its wharfs for the future so that they could be used to aid this process through the importation of marine dredged and other minerals resources into the region. Medway Council has identified significant waste movements between itself and Thurrock Council area and so would welcome discussions on this and the future waste policies for the area in order to plan its own waste strategy.	local plan is based on a robust evidence base which is fully aligned with all relevant national policy and practice guidance.	next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty to Cooperate.
LPIO_398	Natural England (Jamie Melvin)	The environmental impact of proposed waste management sites would need to be properly assessed. Waste management sites may also offer environmental opportunities after use. Selected sites should seek to deliver environmental outcomes. The Pitsea landfill site is a good example where environmental outcomes have been achieved through positive planning.	Comments noted.	No action.
LPIO_127	Port of London Authority (Helena Payne)	Within this section of the consultation document, consideration is given to flood risk. The National Planning Policy Framework states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. The PLA support the conclusions discussed on this matter within the consultation documentation, however, would encourage further consideration to be given to the impact of surface water flooding and run off into the River Thames (Controlled water). Any run off could result in adverse harm to the workings of the Thames, along with and including its biodiversity and ecological habitat.	Comments noted. The Council has commissioned/ is in the process of commissioning a number of technical studies including an up to date Waste Arising's Study to inform the preparation of the Local Plan. If additional waste management sites or mineral extraction sites are required these will be assessed in accordance with national policy and in the context of other emerging Local Plan policies.	No action.
LPIO_373	Recycled in Orsett Via Icen Projects Ltd (Andrew Gale)	Question 39 of the consultation document seeks views on how the Local Plan can ensure that waste management facilities are located, designed and operated to minimise impacts on climate change, local amenity for residents and the natural and built environment. In response, our clients encourage Thurrock Council to adopt a flexible and robust approach to planning for waste capacity within the Local Plan. Future policies should allow for a reasonable level of over provision in order to respond to unforeseen reductions in provision for example, the closure of a	Comments noted. The Council has commissioned/ is in the process of commissioning a number of technical studies including an up to date Waste Arising's Study to inform the preparation of the Local Plan. If additional waste management sites or mineral extraction sites are required	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for

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		<p>facility. In the context of the existing operations and planning consents at Dansand Quarry, Orsett, our clients also encourage Thurrock Council to acknowledge the advantages of the colocation of a waste facility with an existing minerals facility. Previous strategies for waste facilities in Thurrock have been focussed on the location of these sites within urban areas. Our clients object to this strategic vision, as a focus on urban areas would result in an increase in heavy vehicle movements and traffic on the local highway network and residential roads. This would consequently have a detrimental effect on the amenity of existing residents. Previous sites which have been identified as strategic sites were located in high risk flood zones close to the River Thames and within major aquifer zones. In response to Question 39, it appears that Thurrock Councils focus should be on allocating the most appropriate sites for waste facilities, not purely focussing on urban locations. As an example, it is considered that Dansand Quarry should also be allocated within the Local Plan as a Preferred Site for a waste management facility. As presented within the 2015 planning application submission, the site benefits from excellent access to the strategic highway network and is centred geographically within the borough. The site is also some distance from large residential areas and is not subject to flood risk with the site located within Flood Zone 1. An advantage of allocating a site such as Dansand Quarry as a location for wider waste facilities is that existing mitigation measures area already in place to minimise impacts on climate change, local amenity for residents and the natural and built environment. This approach is supported by the National Waste Planning Policy document (October 2014) which encourages waste planning authorities to consider whether the extent to which the capacity of existing operational facilities would satisfy any identified need. Further, the policy document encourages waste planning authorities to consider a broad range of locations, looking for opportunities to co-locate waste management facilities together and with complementary activities. Further, the national policy does not oppose the provision of waste facilities within the Green Belt, subject to demonstrating that the proposed use is appropriate. The National Planning Policy for Waste (October 2014) requires waste planning authorities to ensure that the planned provision of new capacity and its spatial distribution is based on</p>	<p>these will be assessed in accordance with national policy and in the context of other emerging Local Plan policies.</p>	<p>development.</p>

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		robust analysis of best available data and information, and an appraisal of options (para. 2, page 3). As such, our clients also welcome the publication of future waste evidence base documents which have not yet been progressed as part of this early stage of the Local Plan.		
LPIO_378	Recycled in Orsett Via Icen Projects Ltd (Andrew Gale)	Please refer to the supporting Letter - REF: 13/592 (Comment ID: LPIO_373)	Comments noted. The Council has commissioned/ is in the process of commissioning a number of technical studies including an up to date Waste Arising's Study to inform the preparation of the Local Plan. If additional waste management sites or mineral extraction sites are required these will be assessed in accordance with national policy and in the context of other emerging Local Plan policies.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

Responses to Question 40

Comment ID	Consultee Details	Response to question 40 - Are there any matters you think also need to be considered at this stage and why?	Officer Response	Officer Action Points
LPIO_492	Anthony Newell	The infrastructure is not in place to meet the growing population and house building taking place in Thurrock. Our services are struggling to cope and at a time when they should be increased are being reduced due to Government cut backs. This is unfair on the people of Thurrock. Thurrock is a diverse and multicultural community there is a need to ensure that members from all sections of the community feel part of the community and involved in its future.	The production of the Local Plan is being underpinned by the preparation of a wide range of need and capacity studies consistent with the policy approach and guidance set out in the National Planning Policy Framework and Planning Practice Guidance, including studies that look at infrastructure deficits and requirements. With regards to community engagement and ensuring that all sectors of the community are involved, the Council is committed to ensuring that all consultations relating to the Local Plan are open and inclusive.	No action.
LPIO_327	Ellandi LLP (Mark Robinson) Via Savills (Chris Moore)	Context to Representations Ellandi was formed in 2008 and is a leading specialist shopping centre investment and asset manager. The approach is to proactively transform the towns in which it invests by working with occupiers and other stakeholders to ensure that its shopping centres perform a successful and vibrant role for the local communities that they serve. By pioneering a new form of shopping centres that are referred to as Community Shopping Centres. The effect is that where investment has already been made in its shopping centres Ellandi is securing a substantial positive effect on the vitality and viability of the associated town centre. The Ellandi Community Shopping Centre Initiative is a truly community-orientated initiative which, amongst other things, seeks to facilitate through the planning process the repositioning of Ellandi shopping centres, and the town centres they serve, at the heart of their local communities. The Community Shopping Centre sector has benefited from the polarisation of shopping patterns between major comparison destinations, such as Lakeside, and the every-day, community shopping centres, of the type Ellandi invests in. By applying financial and intellectual capital to often under-invested locations, Ellandi has become a market leader in promoting such centres. This promotion includes engaging with local stakeholders, empowering centre managers to connect with local people through events and charities and incubating	Comments noted.	No action.



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		<p>complementary ancillary uses to ensure that the towns in which they operate thrive. Driving Ellandi strategic focus is a fundamental and unwavering belief that community improvement, regeneration and financial return are not mutually exclusive. Rather, it considers its shopping centres have a major role to play in terms of creating a positive impact that improves / regenerates town centres to the benefit of all those involved. This in turn has far-reaching and long term benefits including job creation, social cohesion and encouraging sustainable patterns of travel. Page 2 Importantly, Ellandi recognises that the town planning system has a fundamental role to play in supporting their overarching objectives and therefore welcomes this opportunity to engage with the Thurrock Local Plan at this early preparatory stage. Ellandi look forward to continuing their positive working relationship with Thurrock Council to ensure the Local Plan promotes Grays Town Centre as a focus for regeneration and growth and affords it adequate policy protection so that the investment strategy for the Centre can be brought forward effectively. Grays Shopping Centre Ellandi acquired Grays Shopping Centre in December 2014 as it provides substantial opportunities for positive asset management to enhance the retail, leisure and community offer within Grays Town Centre. Grays is the largest town in the unitary authority of Thurrock and whilst its role as the dominant retail centre in the area has been eroded by Lakeside Shopping Centre, it remains the main administrative centre within the authority. Grays Shopping Centre is located at the heart of the town centre and forms a substantial element of its shopping area within the Adopted 2011 Local Plan. It currently comprises of circa 214,000 sq. ft. of retail space and houses the Town Centres main car park facility which comprises over 700 spaces. Anchor tenants within the scheme include Wilko, 99p Stores, Iceland, Poundland and Peacocks. Thurrock Council has already invested in the regeneration of the Town Centre through projects such as the construction of a new campus for South Essex College and the conversion of the Old Post Office on George Street to Thurrock Centre of Business. Future regeneration projects include the proposed north-south pedestrian underpass at Grays Train Station and a new commercial and residential quarter to the south of the railway to include the new college campus. Ellandi has aspirations to work alongside Thurrock Council to deliver improvements to Grays Shopping Centre in conjunction with the programme of works to be undertaken within the wider town centre. It is with such investment in mind that Ellandi wish to make a</p>		

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		number of practical observations in regard to the Thurrock Local Plan which, amongst other things, is intended to address the management and growth of the Authority's Main Town Centre (Grays) and to ensure that it continues to fulfil a central role for both residents and visitors. Our observations are focused in response to the key questions raised in the Issues and Options Consultation document. They are designed to be productive, to ensure the vitality and viability of Grays Town Centre is preserved and enhanced in line with National Guidance, and to assist the Local Planning Authority in advance of the Local Plan being progressed towards Examination.		
LPIO_161	Essex Bridleways Association (Sue Dobson)	There appears to be no reference particularly to any policy on green infrastructure and how this will sit in relation to other policies set out in this document and this should be addressed.	Concern noted. The Issues and Options (Stage 1) consultation document was intended to scope out the big issues and included questions relating to open spaces, designated nature sites and sustainable forms of transport all of which could be defined as green infrastructure. The Issues and Options (Stage 2) consultation document will include more detailed information about green infrastructure and potential policy approaches. It should also be noted that the Council is currently preparing a new Active Place Strategy which will identify proposals to improve the nature, quality and provision of leisure and recreational facilities across the whole of Thurrock.	No immediate action required.
LPIO_302	Gladman Developments Ltd (Phil Bamford)	7.1.1 Having considered the Thurrock Local Plan Issues and Options (Stage 1), Gladman have raised a range of matters including the housing requirement, spatial strategy and housing policies that the Council need to consider. 7.1.2 The plan must be positively prepared, effective, justified and consistent with national policy to be found sound at examination. In the first instance, the Council must start with clearly defining an NPPF and PPG compliant OAN by developing an unconstrained requirement which properly follows the guidelines set out at the national level. The Council should then develop a robust housing requirement using this OAN as a starting point. 7.1.3 Careful consideration needs to be given to the	Comments noted. The production of the Local Plan is being underpinned by the preparation of a wide range of need and capacity studies consistent with the policy approach and guidance set out in the National PPF and PPG. This includes the South Essex Strategic Housing Market Assessment, the Thurrock Housing Land Availability Assessment and the Thurrock	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.

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		<p>spatial strategy that forms the basis of the spatial distribution of growth across the borough. All sustainable settlements should be allowed to play their part in meeting their own housing and employment needs as well as contributing to the wider boroughs requirements. A flexible approach to delivering the development needs of the borough will ensure the plans ultimate deliverability and success.</p>	<p>Green Belt Assessment. The Thurrock Local Plan Issues and Options (Stage 2) consultation document will consider the need for a green belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.</p>	
LPIO_257	Gravesham Borough Council (Wendy Lane)	<p>Please see our comments on Section 3: Key policy areas - SHOPPING AND LEISURE OPPORTUNITIES under questions 15, 17 +</p>	<p>Comments noted. The Council on behalf of the South Essex authorities have commissioned the South Essex Strategic Retail Study to identify future retail needs and capacity across the sub-region over the Local Plan period to 2036. This evidence will be used to inform the development of an appropriate strategy for managing the future development of the network of centres across South Essex including the future scale and distribution of new comparison, convenience and leisure floorspace. As part of the process of preparing the new Local Plan the Council will need to review the current policy approach for Lakeside and to update the quantitative projections for future retail and convenience shopping needs set out in the adopted Core Strategy. The Council has also prepared the Lakeside Development Framework and the Lakeside Transport Strategy to help inform the preparation of an Inset Plan to manage the future development of the area. Both studies are available to view on the Councils Local Plan website. The Council will engage proactively with neighbouring local authorities through the Duty To Cooperate</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and to meet the Councils obligations under the Duty To Cooperate.</p>

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			process to ensure the proper management and development of a competitive and viable network of centres across the Thames Gateway and East London.	
LPIO_81	KTI Energy Limited (Bill Temple-Pediani)	My company is wholly supportive of Dunton Garden Suburb. We have already submitted representations to the draft Basildon and Brentwood Local Plans calling for all new properties to be connected to a Combined Heat & Power scheme called DunCHP generating and supplying low carbon electricity and heat to those properties. The attached file encourages Thurrock Council to examine closely the addition of land to the south of the Southend rail line added to that already committed to Dunton Garden Suburb. Three reasons are entered below. Firstly, we could add some 3,000 new dwellings to Dunton Garden Suburb. Secondly, there would be improved reason to build a new rail station called Dunton serving the new community. Thirdly, improved symmetry would be afforded to Basildon and Brentwood built environments. Kindly consider such allocation of new site for housing and its viability should Option C for the new Thames Crossing be adopted.	Support for Dunton Garden Suburb noted. Suggestion that additional land is allocated for housing to support the development of a combined heat and power station at Dunton is acknowledged. It should be noted that land to the north of the borough is within the green belt. The Council has commissioned the preparation of a borough wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of green belt boundaries will only be made should the on-going Strategic Housing Market Assessment/Housing Land Availability Assessment process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area.	No immediate action required.
LPIO_187	Local Access Forum (Sue Dobson)	There appears to be no reference to any policy on green infrastructure and how this will sit in relation to other policies set out in this document, and this should be addressed.	Concern noted. The Issues and Options (Stage 1) consultation document was intended to scope out the big issues and included questions relating to open spaces, designated nature sites and sustainable forms of transport all of which could be defined as green infrastructure. The Issues and Options (Stage 2) consultation document will include more detailed information about green infrastructure and potential policy approaches. It	No immediate action required.

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			should also be noted that the Council is currently preparing a new Active Place Strategy which will identify proposals to improve the nature, quality and provision of leisure and recreational facilities across the whole of Thurrock.	
LPIO_147	Malthurst Ltd Via Rapleys LLP (Hannah Thomas- Davies)	We are instructed to submit these representations on behalf of our client Malthurst Ltd, in response to the consultation on the Local Plan Issues and Options (Stage 1) February 2016. We request that the contents of this letter are taken into account and are addressed by the Council when preparing the subsequent versions of the Local Plan. Our client owns the Thurrock Motorway Service Area (MSA), which is located at the junction between the A1306 and A282. The enclosed site location plan shows the extent of our clients ownership within the red line demarcated on the plan. The site comprises a variety of roadside services, including extensive areas of hard standing to provide parking for cars and HGVs, a petrol filling station, hotel and several restaurant/cafe and takeaway uses. The site is currently within the designated Metropolitan Green Belt in the Core Strategy (adopted December 2011). The site is a long-established roadside service area - permission was originally granted for a motorway service area on the site in 1985. Paragraph 79 of the NPPF states that the fundamental aim of the Green Belt is to prevent urban sprawl by keeping land permanently open. The Thurrock MSA is not open, as described above the site is occupied by large areas of hard standing and access roads, as well as buildings and structures to accommodate the roadside uses. The continued designation of the site within the Green Belt is therefore not in accordance with the NPPF as it does not meet the essential open and permanent characteristics of the Green Belt as it is not open, and has been built-up for around 30 years. The first purpose of the Green Belt set out in paragraph 80 of the NPPF is to check the unrestricted sprawl of large built up areas. The Thurrock MSA is located directly adjacent to the Thurrock Retail Area, between the A1306, A282 and A13 roads. To the north of the site, the Mar Dyke and associated agricultural land creates a clear separation between the built up area of Thurrock to the south and Aveley and South Ockenden to the north. As described above, the site is a long-established built-up use in the Green Belt and given its developed nature and proximity to both the settlement of Thurrock and the associated transport infrastructure it is	Comments noted. The Council has commissioned the preparation of a Borough wide Green Belt Assessment to inform the preparation of the Local Plan. The Thurrock Local Plan Issues and Options (Stage 2) consultation document will consider the need for a green belt review and set out a range of appropriate spatial options for meeting the boroughs future development needs.	No immediate action required.

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		<p>not considered that the site current designation does not assist the first purpose of the Green Belt. The second purpose of the Green Belt is to prevent neighbouring towns merging into one another. As noted above the Thurrock MSA site is located adjacent to the northern settlement boundary of Thurrock. The nearest settlements are Aveley and South Ockenden to the north of the A13 and the Mar Dyke, which act as strong geographical boundaries to prevent the merging of Thurrock and the settlements to the north. The designation of Thurrock MSA does not assist with the second purpose of the Green Belt, as set out in paragraph 80 of the NPPF. The third purpose of the Green Belt, set out in paragraph 80 of the NPPF is to assist in safeguarding the countryside from encroachment. Given that the Thurrock MSA site is already developed it is not considered that the site assists the third purpose of the Green Belt. In terms of the fourth purpose of the Green Belt to preserve the setting and special character of historic towns, it is not considered this purpose is relevant to the designation of the Thurrock Green Belt and it not considered that the removal of the Thurrock MSA site from the Green Belt designation will have any impact on meeting this purpose. The fifth purpose of the Green Belt is to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Given that the Thurrock MSA site is already developed and was developed in its specific location to meet the needs of road users, it is not considered that the release of the site from the Green Belt would prevent urban sites coming forward for development.</p>		
LPIO_349	Miller Strategic Land Via MRPP (Richard Robeson)	<p>There are a number of concerns, involving both the scope and speed of the Local Plan process. These are set out in the related covering letter. This letter accompanies our representations relating to the above consultation. Aside from the particular issues expressed in the responses themselves, we have some concerns relating to the Issues and Options document and the wider Local Plan process in Thurrock in the context of the onus on local authorities to ensure their development plans are up to date and effective. The pressing need to adopt an up-to-date Local Plan Thurrock Councils development plan currently consists of the Core Strategy (2011), together with the Saved Policies of the Thurrock Borough Local Plan 1997. Both were adopted pre-Framework. While the Core Strategy has been the subject of a Focused Review (2015), intervention by the Inspectorate meant that a wider review including, for example, housing supply was not progressed. The intervention also resulted in Thurrock</p>	<p>Concern noted. The purpose of the Issues and Options (Stage 1) consultation document was to scope out the big issues. Uncertainty regarding the Lower Thames Crossing and the impact it could potentially have on housing and employment needs restricted the Councils ability to explore more detailed issues relating to targets and spatial distribution at that stage. With regards to the commissioning of key evidence studies it should be noted that the production of the Local Plan is being underpinned by the preparation</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>



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		<p>suspending its related LDF work, including site allocations in February 2014, with a view to producing a fresh, NPPF-compliant, Local Plan. Thurrock, therefore, has a number of critical development plan policies that can be regarded in Framework terms as out of date (as per Paragraph 14) and thus only limited weight can be applied to them (Paragraph 216 of the Framework). Not only does this potentially make it harder to resist proposals not in accordance with the development plan (i.e. because it is out of date) but, may also put the Council at risk of intervention by Government, in terms of its Local Plan process. In a Ministerial Statement in July 2015, Brandon Lewis MP stated that, in cases where no Local Plan has been produced by early 2017 five years after publication of the NPPF we will intervene to arrange for the Plan to be written. There is now less than two years for the Council to adopt a Framework-complaint Local Plan before the risk of intervention becomes live. This is particularly relevant where there are no or very few up-to-date site allocations to deliver necessary new development. The New Thurrock Local Plan Over two years after announcing the suspension of its LDF process to prepare a new Local Plan, the Council is now consulting on Issues and Options. Not only are we concerned that another two years have passed and that this is merely the Stage 1 of the Issues &amp; Options phase, the process appears to be failing to address key issues facing the Borough. Whilst we accept that evidence is fluid and continuously being prepared and/or under review, it is clear that the Issues &amp; Options document is not based on sufficient or appropriate evidence. Instead, it invites comments in the context of the existing Core Strategy, rather than identifying the type and scale of development needed in the Borough (informed by appropriate evidence) and seeking views on how and where it should be accommodated. The failure of even the initial consultation document to outline to the public and others the likely scale of housing and other needs will no doubt result in somewhat continued responses. The NPPF highlights the need for early and meaningful engagement (our emphasis) and this simply doesn't appear to be the case at present. Whilst plan production is by no means prescriptive, it is vital that consultees understand the questions posed and the context in which decisions on the amount and distribution of development will be made. Whereas, the present Issues &amp; Options consultation does not clearly set-out the development issues facing the Borough or genuine options for addressing it. The meaningfulness of the process is therefore questioned.</p>	<p>of a wide range of need and capacity studies. This includes the South Essex Strategic Housing Market Assessment, the Thurrock Housing Land Availability Assessment and the Thurrock Green Belt Assessment. A decision on whether to undertake a review of Green Belt boundaries will only be made should the ongoing SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs. Comments relating to the duty to cooperate are noted but seen to be unfounded. The Council has been actively working with adjoining authorities and other duty to cooperate bodies to ensure that the evidence supporting the Local Plan is robust and appropriately aligned with other studies.</p>	

Comment ID	Consultee Details	Response to question 40 - Are there any matters you think also need to be considered at this stage and why?	Officer Response	Officer Action Points
		<p>We also have reservations regarding the Councils approach to its Green Belt. The Councils initial revised LDS was clear that the evidence base would include a full Green Belt Review. We now understand that a Green Belt Review will only take place once it is confirmed that the scale of new housing required cannot be accommodated on PDL in the existing urban areas. However, not only does a staged approach take additional time, the Council through various previous calls for sites, draft site Allocations and detailed appraisals through appeals, etc., must possess an existing understanding of the capacity of the urban area through which to make a decision on the requirement for a Green Belt Review, thus avoiding future delay. Thurrock's current LDS states that adoption of the new Local Plan is not expected to take place until 2020. Such a delay would mean another four years of uncertainty for development management in Thurrock. This is at variance to the Governments position, set out in a letter from the Minister to the Chief Executive of the Planning Inspectorate (July 2015), in which he stated, there is a real value in getting a Local Plan in place at the soonest opportunity, even if it has some shortcomings which are not critical to the whole plan. Finally, while we welcome the statement within the Issues and Options document that Thurrock is working jointly with other local authorities in the vicinity (paragraph 1.13); the focus appears to be with authorities in the South Essex Housing Market Area. As such, considerations regarding cross border issues with other areas, notably Greater London, where there is significant housing stress, appear to be overlooked. In addition, the focus of much of this section is on future works suggesting that the Duty to Cooperate may not be sufficiently embedded in the plan making process from the outset. In summary, notwithstanding the representations made on behalf of our client, the Issues and Options document does not undertake early and meaningful engagement, as required by national policy and guidance. The excessively staged approach the Council is taking towards a Green Belt review risks delaying the Local Plan process further, when the onus is on local authorities to have plans in place as soon as possible. There are also concerns that the Duty to Cooperate is not sufficiently embedded within Thurrock's Local Plan process.</p>		
LPIO_399	Natural England (Jamie Melvin)	Natural England would expect to see policies relating to soils, best and most versatile agricultural land and geodiversity in the draft plan. Natural England expects the Plan to consider the strategic impacts on water quality and resources as outlined in paragraph 156 of the NPPF. The	Comments noted.	Ensure that emerging policies in the Local Plan address the requirements set out in the National Planning Policy Framework.

Comment ID	Consultee Details	Response to question 40 - Are there any matters you think also need to be considered at this stage and why?	Officer Response	Officer Action Points
		Local Plan should identify relevant areas of tranquillity and provide appropriate policy protection to such areas as identified in paragraph 123 of the NPPF. We also encourage the provision of a strategy for green infrastructure to be included within a specific policy in the Local Plan or alternatively integrated into relevant other policies, for example biodiversity, green space, flood risk, climate change, reflecting the multifunctional benefits of green infrastructure.		
LPIO_141	Persimmon Homes Essex (Anna Davies)	<p>There have been significant delays in the production of previous development plans. At the point of adoption in 2011 it was recognised that the Core Strategy needed to be subject to immediate review to address housing needs. The lack of housing allocations and housing land supply has and will continue to impact upon housing delivery. The adoption of the new Local Plan (2020) is over 4 years away. The Council does not have a published strategy for bolstering housing land supply in the period up to the adoption of the new Local Plan. The Council need to identify a strategy to boost significantly the supply of housing in the period up to the adoption of the development plan, such measure should include the early identification of suitable new sites and seeking to pro-actively work with landowners and developers to bring such sites forward. The Council must ensure that a new development plan is taken forward without further delay. The continued lack of an up to date development plan is significantly hampering delivery and the regeneration imperative. Persimmon Homes are disappointed that the Council has not sought to identify housing and employment targets and potential broad spatial options for accommodating growth at this stage. Thurrock Borough Council must ensure that the Local Plan allocates sites which can be delivered within the specified timeframes to ensure that a 5 year housing land supply can be maintained. The adopted Core Strategy has failed to do so. Persimmon Homes have interest in two strategic sites within the Borough. Both of which are considered, suitable, deliverable and available for residential development. Persimmon Homes has a good track record for delivering sites within Thurrock over many years and has a good working relationship with Officers. Further details, along with plans, are submitted as part of this submission to support their allocation within the Local Plan for development. The geographical location of Thurrock offers huge benefits and the Council need to take advantage of these benefits and proposed infrastructure, including the new Lower Thames Crossing. In order to attract new investment and people, the council</p>	<p>Disappointment regarding the lack of detail within the Issues and Options (Stage 1) document is noted. However it should be recognised that until such time as the Government makes a decision on the Lower Thames Crossing it remains difficult for the Council to plan appropriately for the future development of Thurrock. It is anticipated that the Thurrock Local Plan Issues and Options (Stage 2) consultation document will include more detailed information on housing and employment targets and spatial options for growth. With regards to the sites Persimmon Homes has submitted for consideration it should be noted that the Council is currently in the process of undertaking a comprehensive Housing Land Availability Assessment.</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>

Comment ID	Consultee Details	Response to question 40 - Are there any matters you think also need to be considered at this stage and why?	Officer Response	Officer Action Points
		need to ensure that the right amount and type of housing is delivered within the Borough. The next iteration of the Local Plan will need to crystallise the Boroughs housing targets, details spatial options and suggest the Councils preferred spatial strategy based on the evidence base undertaken to date.		
LPIO_277	QUOD	<p>Summary A review of Thurrock's Green Belt is long overdue. The National Planning Policy Framework (NPPF) defines the five purposes of the Green Belt as: to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. These five purposes should form the context within which a Green Belt review should be carried out. There are many sites within Thurrock's Green Belt which are of low or negligible quality, not contributing to all or any of the five key purposes and could be released for development. The Council does not have an up to date Housing Land Study; however, the most recent Annual Monitoring Report (2014) evidences that there is an acute need for housing sites in the Borough. Our research shows that it is unlikely that Thurrock can meet the scale of emerging housing need without revising Green Belt boundaries. Despite this, there have been a number of applications for housing development on Green Belt sites refused recently in Thurrock on the grounds that exceptional circumstances do not exist. The recent Richborough judgement confirms that Councils who are not meeting their five year housing land supply should not use Green Belt policies to restrict housing development. This is very significant in Thurrock considering that there are sites within the Green Belt which are suitable for development. The 2012 Employment Land update found that there is sufficient employment land in the borough until 2021. There is no confirmation that the Council has sufficient sites to meet its employment requirements beyond this. A Green Belt review should be undertaken to identify suitable sites, which do exist within Thurrock's Green Belt. It is clear that Thurrock need to release Green Belt land for development and this must form part of the development plan making process.</p>	<p>The production of the Local Plan is being underpinned by the preparation of a wide range of need and capacity studies consistent with the policy approach and guidance set out in the National Planning Policy Framework and Planning Practice Guidance. This includes the South Essex Strategic Housing Market Assessment and the South Essex Economic Development Needs Assessment and the Thurrock Green Belt Assessment. A decision on whether to undertake a review of Green Belt boundaries will only be made if there is a need to identify and allocate additional land for development in order to meet future housing and employment needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>
LPIO_379	Recycled in Orsett Via Icen Projects Ltd (Andrew	<p>It is understood that it is Highways England's intention to progress a Lower Thames Crossing. The draft consultation document makes no reference to this significant piece of infrastructure. Therefore, in response</p>	<p>The significance of the Lower Thames Crossing to the Local Plan is acknowledged; however as the Highways England</p>	<p>Ensure that the Issues and Options (Stage 2) consultation document makes reference to and</p>

<b>Comment ID</b>	<b>Consultee Details</b>	<b>Response to question 40 - Are there any matters you think also need to be considered at this stage and why?</b>	<b>Officer Response</b>	<b>Officer Action Points</b>
	Gale)	to Question 2, this is a key cross boundary issues that does not appear to have been considered within the current consultation document.	proposal was subject to consultation at the same time as the Local Plan (Stage 1) consultation documents it would have been impractical to ask a specific question regarding the impact of the Lower Thames Crossing on the emerging Plan. It is intended that the Thurrock Local Plan Issues and Options (Stage 2) consultation document will consider the implications of any potential Lower Thames Crossing in more detail.	appropriately considers the implications of the proposed Lower Thames Crossing.
LPIO_95	Rochford District Council (Natalie Hayward)	Rochford District Council would welcome opportunities to continue to engage with Thurrock Borough Council on strategic planning matters particularly in relation to meeting housing needs and highways impacts through the Duty to Co-operate, as both Local Planning Authorities continue to progress and review their respective local development plans.	Noted.	No action required.
LPIO_307	RWE Generation UK plc (Matthew Trigg)	In response to the Issues and Options consultation, RWE requests that Thurrock Council recognise: The previously developed nature of Tilbury Power Station That the Site is important for future power generation purposes given its proximity to grid infrastructure and cooling water The fact that it is operational land held for the purposes of electricity undertaking purposes, and That the Green Belt boundary will need to be amended to facilitate the delivery of nationally significant infrastructure development. As the Local Plan evolves land at Tilbury Power Station should be allocated for power generation purposes.	Comments noted. The production of the Local Plan is being underpinned by the preparation of a wide range of need and capacity studies consistent with the policy approach and guidance set out in the National Planning Policy Framework and Planning Practice Guidance. This includes the South Essex Strategic Economic Development Needs Assessments and Thurrock Green Belt Assessment. The Council will also be commissioning additional studies to look at infrastructure deficits and requirements. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.



Comment ID	Consultee Details	Response to question 40 - Are there any matters you think also need to be considered at this stage and why?	Officer Response	Officer Action Points
			development needs.	
LPIO_306	SEGRO Industrial Estates Ltd Via Barton Willmore (Gemma Johnson)	There is a clear need for a significant amount of additional employment land to be delivered within the Borough through the new Local Plan. Whilst Thurrock's urban areas and major growth hubs are an appropriate starting point for the delivery of this employment growth, it is considered that appropriate extensions to these areas will be required to meet the employment needs of the Borough in full. In particular, extensions to the Key Strategic Growth Hubs should be considered, as these have been successful in attracting private sector investment since the adoption of the Core Strategy in 2011. Where possible, these extensions should be located outside of the Green Belt. We thank Thurrock for this early opportunity to engage on both the Local Plan and the Call for Sites. If any further information is required at this stage regarding our submissions, please do not hesitate to contact me.	The production of the Local Plan is being underpinned by the preparation of a wide range of need and capacity studies consistent with the policy approach and guidance set out in the National Planning Policy Framework and Planning Practice Guidance. This includes the South Essex Economic Development Needs Assessment, Thurrock Employment Land Availability Assessment and the Thurrock Green Belt Assessment. A decision on whether to undertake a review of Green Belt boundaries will only be made if there is a need to identify and allocate additional land for development in order to meet future employment needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.
LPIO_249	Starcourt Developments Ltd (Brian Cooke) Via Barton Willmore (Justine Bailey)	One of the key issues to be emphasised within the Plan, is the need to be flexible and not to stick to rigid criteria which could prevent sites coming forward within a Borough that is continually growing in terms of population and employment. The key reason for this is the constrained nature of the Borough, with particular reference to the Metropolitan Green Belt and the high proportion of land outside of flood zone 1. By attempting to restrict development within these areas, the Council are highly unlikely to be able to provide the required numbers of new dwellings and employment. Flexibility is therefore the only method of ensuring that enough appropriate sites come forward to meet this demand. As noted, we are bringing forward land within the control of our client, South of Mar Dyke, as part of the concurrent Call for Sites	The production of the Local Plan is being underpinned by the preparation of a wide range of need and capacity studies consistent with the policy approach and guidance set out in the National Planning Policy Framework and Planning Practice Guidance. This includes the South Essex Strategic Housing Market Assessment and the South Essex Economic Development Needs Assessment and the Thurrock Green Belt	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.



Comment ID	Consultee Details	Response to question 40 - Are there any matters you think also need to be considered at this stage and why?	Officer Response	Officer Action Points
		<p>procedure. The site is considered to be appropriate for bringing forward both residential and employment uses. Despite its location within the Metropolitan Green Belt, it is urbane in character and is not considered to harm the five purposes of the Green Belt, as set out within paragraph 80 of the NPPF. A key attribute of the site is that it is within a self-contained location with defensible boundaries and further development would be checked by the physical and natural characteristics of the area such as the A13. The presence of the pylons across the site also gives the impression of a more urban location, and restricts its Green Belt openness. The pylons diminish the quality of this urban landscape and therefore the value of the Landscape Character Type (West Thurrock and Purfleet Urban Area) is low.</p>	<p>Assessment. A decision on whether to undertake a review of Green Belt boundaries will only be made if there is a need to identify and allocate additional land for development in order to meet future housing and employment needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) Consultation Document will consider the need for a Green Belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.</p>	
LPIO_546	Taylor Wimpey East London Via Barton Wilmore (Lauren Dooley)	<p>We consider that the Council has a duty to bring forth sustainable sites to meet full objectively assessed housing needs. We are aware that due to the constrained nature of Thurrock that this will be challenging however we would encourage The Council to undertake a full Green Belt review. The accompanying Call for Sites representation demonstrates that the Site at the Former London Fire Brigade Sports &amp; Social Club is available and suitable for development, and that such development would be achievable in accordance with the requirements of paragraph 47 of the National Planning Policy Framework (NPPF). The Site is located within a sustainable location in proximity to the proposed Purfleet regeneration area. The site has the opportunity to support this regeneration through the provision of new homes of varied sizes and tenures as well as assisting in providing links from Purfleet centre to the Mardyke Valley and beyond. The Site is within walking distance of Purfleet centre, and would assist in supporting the economy of the local centre in the future. The Site represents a natural extension to Purfleet with further development prevented from spilling north by the A13. Having undertaken a review of the environmental considerations of the Site including a review of the Sites contribution to the Green Belt, the Site is considered suitable to accommodate residential development without detriment to the purposes of the Green Belt, landscape character, features, heritage or visual amenity of the local area, and is not considered to be at risk of flooding, surface water issues, contamination from historic land uses or air pollution. Taking into consideration the planning policy framework, contextual analysis and</p>	<p>Noted. The Council has commissioned the preparation of a borough wide Green Belt Assessment to inform the preparation of the Local Plan. A decision on whether to undertake a review of green belt boundaries will only be made should the on-going SHMA/HLAA process indicate that there is a need to identify and allocate additional land for development in order to meet future housing needs which cannot be met within the existing urban area. The Thurrock Local Plan Issues and Options (Stage 2) consultation document will consider the need for a green belt review and set out a range of appropriate spatial options for meeting the Boroughs future development needs.</p>	<p>The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.</p>

Comment ID	Consultee Details	Response to question 40 - Are there any matters you think also need to be considered at this stage and why?	Officer Response	Officer Action Points
		environmental considerations of the Site, these Representations conclude that the allocation of the Site for development in the emerging TLP would be in accordance with the overarching principles of national and local planning policy on sustainability and need as well as the vision, objectives and aspirations of Thurrock Council.		
LPIO_555	The Billings Group Via DHA (David Bedford)	In summary, we support the commitment to a New Local Plan that will identify and plan for full objectively assessed development needs of the area. Furthermore, we consider our clients land has a positive role to play in delivering the sustainable development that will be needed.	Support noted.	The Council will arrange a meeting with the respondent to discuss their representations and to agree next steps in terms of the development of a robust evidence base to underpin the preparation of a sound plan and the allocation of individual sites for development.



## APPENDIX D: Full list of Burning Issues

A hospital nearest Basildon where A&E always busy.

Activities for teenagers.

Additional employment sites should be identified outside existing industrial areas.

Affordable housing is designed well.

Against new housing in east tilbury because of infrastructure - roads, schools, GPs.

Air cadets meeting places.

Air pollution as building to close to M25.

Air pollution in Thurrock is already extremely bad.

Air pollution.

Air quality needs improving.

Air quality needs to be improved.

Air quality will decline with 2nd crossing.

Air Quality.

All the extra housing need also sports facilities to deal with those people.

All the S.106 money generated from the development here is not seen to deliver the local infrastructure or facilities of equal value. Where is the money?

Allocation of council housing is unfair. Right homes for the right people.

Allotments - Need to save existing and new ones.

Area has declined - quality of environment - we are losing our local facilities.

Area needs more attention and looking after.

Arts and culture are important to communities.

As a result of all HGV's, roads are in poor conditions.

As knew port was coming why the local population wasn't skilled up.

Asda roundabout is a safety issue.

Aveley park - behind car park needs significant work. Upminster park is a very good example.

Avoid flood areas for housing.

Balance the need for more housing with preserving our precious greenbelt.

Belhus park - large open space with absolutely nothing apart from football pitches.

Better bus service is needed to connect with Basildon and Orsett.

Better community infrastructure.

Better community safety.

Better health care near employment areas.

Better road maintenance.

Better waterfront for leisure. Need more growth in local shops

Big need for affordable housing.

Black Greenhouses - PV generation should be put on the warehouse roofs before more green belt is converted to PV generation.

Bridge congestion causes issues for schools and doctors.

Bring in and attract high quality IT and engineering employers.

Brownfield site first.

Brownfield sites - Old Bata factory buildings. Conversion to flats was planned but didn't happen.

Brownfield sites first and meet local needs.

Build on brownfield and protect open spaces.

Building more houses in Corringham will mean more cars, more congestion.

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Bus fares are too high.

Bus links are good in Chadwell but need more frequency to hospital.

Bus network at weekends is poor.

Bus services and road infrastructure. Not good enough for number of people on roads.

Bus services are not great. Parking is becoming increasingly difficult.

Buy to let investors need to be restricted.

Car parking needed near shops and train station.

Centres for older people to do activities.

Changes to traffic flow around Grays town centre.

Children's play parks/spaces need more facilities. Park near me only has two goal posts and my children bore easily.

Clean and green needs addressing.

Clean up conditions when granting permission.

Community centres use money from new housing.

Community garden at back of library needs updating.

Community mums and dads group

Community needs more information about what's happening. All by social media.

Compulsory Purchase powers need to be used in the right way not illegally.

Concerns about affordable family housing.

Concerns about over developed, low quality housing.

Concerns about pay to stay plans in 2017

Condition of roads. Development without infrastructure. No development on recreation grounds.

Congestion A13/M25 pinch points.

Congestion in urban areas as a result of new development.

Consider the needs of residents first on any decision.

Cost of housing and need for smaller houses.

Country parks and open spaces are a real asset these need to be promoted more.

Crossing should be free for residents.

Deal with traffic problems.

Design of new homes is important to existing residents.

Design of new housing, look important more traditional.

Developers must be made to deliver on their "community benefit" element of development.

Development boundaries.

Development money and community gain needs to be spent on local services.

Do not allow developer to cut down on parking spaces by running buses through new estates.

Do not build on green belt.

Do not build on open spaces.

Do not relocate the train station.

Doesn't feel safe to let your kids play out.

Don't close Stanford train station.

Don't have enough facilities for children and young people. Need parks and youth clubs.

Don't object to new housing, but need the infrastructure to support.

Drinking and soft drugs has become problem.

East Tilbury forgotten and bottom of list.

East Tilbury only has on nursery - need more provision.

Educational provision relating to changing demography of authority.

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Elderly rely on local services, buses and GPs. Hospital difficult to get to and train fares are a lot.  
Emphasis should come off roads, HGV's etc.  
Employment opportunity needed here. People have to travel to London. Skilled, good quality.  
Employment opportunities. Need to be supported by childcare facilities.  
Engagements need to be more than Local community forum.  
Engineering jobs should be promoted in borough to rebuild our neighbourhood.  
Ensure infrastructure is adequate before planning applications are agreed.  
Environment and tidiness. Public transport improvements and road safety.  
Environment is an issue - pollution levels very high.  
Environment needs improvement.  
Environmental cleaning.  
Environmental issues - Climate change  
Everything seems to go to West Thurrock.  
Executive homes are needed.  
Existing schools struggling with getting teachers.  
Expectation of residents in new homes built in Aveley was that they would walk and use local shops. This hasn't happened.  
External HA's buying new housing for their tenants. So housing not going to local people.  
Ferry links to paramount park.  
Ferry routes need to be protected but with better links.  
Flood areas - do not build in areas of flood, future areas liable for flooding.  
Food waste from supermarkets.  
Football club being moved to Belhus park - which has taken away a natural open space from local people.  
Footpaths and running routes.  
For every 1000 houses built should be a new park.  
For local people the present car parking is inconvenient at times.  
Free travel for under 18's  
Freight from DP world should run mainly at night, but doesn't. Many movements during the day with crossing problems.  
General cleanliness  
General upkeep issues like litter and street sweeping.  
Getting GP and Hospital appointments is difficult, more people will put more pressure on these services  
Good environment, clean and tidy, well looked after. Place to be proud of.  
Good house sizes  
Good policies are often superseded by policies by politicians.  
Good walking routes but need to be protected.  
GP appointments are getting increasingly difficult to book.  
GP facilities not good enough.  
GP facility replacement for Grays walk in is not appropriate.  
Graffiti. Should provide places where this is encouraged to stop vandalism.  
Grays beach could be a good location for a skate park.  
Grays town centre needs public realm improvements.  
Growth and character - Need to keep open space - sense of country.  
Gypsy and traveller sites should be gated in suitable locations.  
Health centres and schooling.



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Health infrastructure.

Healthwatch study of day care centres haven't come out good, down to only 3.

HGV movements causing issues.

HGV movements need to be monitored.

HGV movements.

HGV parking.

HGV's - 300 a day going to quarry. Dangerous on road where only 2 cars can pass each other. School at end and new state on narrow road.

HGV's come through village even though they are not meant to.

High street needs updating.

Highway maintenance.

Highways need improving.

Home improvements in green belt are too restrictive - Need to apply flex.

Horndon needs more housing to support local shops.

How's your park - focus on teenage provision. How they use space and what kind of facilities do they need.

Hospitals, healthcare, schools, police, fire service, where do they fit in?

Housing allocation policy doesn't work. Affordable housing needs to be improved

Housing allocations policy is wrong. Thurrock residents first not direct access for others.

Housing before infrastructure

Housing for ex-service men and women.

Housing for older people in the villages

Housing mix. Smaller units needed for people downsizing.

How does Boris Johnson 2050 plan fit into the local plan?

How does the plan relate to the Greater London Plan 2050 that proposes to have a single conurbation?

I am not in favour of gated communities because the so called public spaces are not road public.

I have views about impact of ports on residential amenity and road networks.

If growth happens need to safeguard increase capacity of schools - now and in the future.

If more housing what about hospitals etc.

Improve air quality.

Improve environment including parks.

Improve public transport time between buses.

Improve public transport. Need arrive or larger company to provide more frequent service.

Improve safety around Grays town centre.

Improve safety in Grays Town Centre.

Improve the quality of the environment. More indoor and outdoor facilities for young people or older children.

Improved hospital provision.

Improvement in facilities for young people to socialise.

Improvement to litter services and fly tipping.

Improvement to public transport.

Improvement to railway crossing, emergency services and trains from ports.

Improvements to pavement, parking, signs and buses for disabled people.

Increased traffic and congestion is a big issue.

Increasing number of storage units but no increase local jobs.

Information points in town centre locations - council services.

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Infrastructure already under pressure - roads, schools, GP's and hospitals.  
Infrastructure before building but not on Green belt land.  
Infrastructure before development. Planned development in right areas - so as not to create more congestion.  
Infrastructure before development. What about a footbridge.  
Infrastructure before new development - hospitals and schools.  
Infrastructure in place before houses is built. Services already under strain.  
Infrastructure issues.  
Infrastructure, roads need to be improved. Education - Adequate places for schools.  
Issues for cyclists outside Palmers College, students block cycle routes.  
Jobs - If want decent job have to travel to London.  
Keep us green.  
Lack of activities for children and young people.  
Lack of activity in centres. It is not just about retail.  
Lack of amenities - GP€™s, - Play Areas - Nothing in the evening Feeling isolated  
Lack of community spirit.  
Lack of jobs.  
Lack of ownership of public space. Any problems lead to wrangle.  
Lack of social communities and infrastructure.  
Lack of social housing for family and older.  
Lack of Traffic and Parking  
Lakeside needs a better mix of shops.  
Lakeside needs more leisure activities.  
Lakeside would be a good spot for a health care drop in.  
Language in planning documents is too technical more effort needs to be made to make it plain english and more understandable to residents.  
Level crossing a problem. East Thurrock not well served.  
Level crossing barriers break down and can get stuck for up to 2 hrs.  
Libraries are important.  
Libraries need to open longer.  
Libraries under threat of closure.  
Limited potential for new housing in Orsett.  
Litter and area maintenance.  
Litter and bins need to be emptied.  
Litter and poo maintenance.  
Litter.  
Litter.  
Local people need to know how many houses are being built  
Local Plan document too long. Too many questions (40) and complicated.  
Local services and facilities for those who don't drive.  
Local swimming pool is important and should be safeguarded.  
Location of lower crossing.  
Locking up equipment at night to stop vandalism.  
London effect on house prices and availability.  
Londoners/others commute to work use A13 and capacity issue.  
Long term strategy to deal with older people.  
Look at infrastructure before development happens.

Loss of community facilities to residential is a concern.

Loss of rural character to areas like Corringham.

Lower Thames crossing not needed and is a potential danger.

Lower Thames Crossing.

Maintain existing footpaths. Especially walk to seawall.

Make developers build social housing first. Many occasions developers get out of building any.

Make sure infrastructure goes in before housing

Maximise the opportunity created by Paramount Park.

Maintenance needed to HGV movements and roads.

More activities for older kids.

More activities for older people and teenagers.

More affordable 3 bedroom housing.

More affordable child care.

More affordable housing and flats for young adults.

More affordable housing in Thurrock.

More affordable housing.

More and more people are moving into the area so the affordability, accessibility of housing became an issue.

More car parking in town centres.

More council housing association houses needed. Not everyone can buy and more secure than private rented.

More country parks and activity trails.

More facilities are needed for children to get them off the streets.

More GP facilities.

More houses are ok, infrastructure needed.

More jobs are needed for older people.

Later buses - from Grays to commute, Improve payments of buses.

More leisure needed like bowling alleys.

More library and community facilities.

More local doctors needed to deal with extra housing.

More open spaces. Poor public transport, need buses to main railway stations - Over 60's need much better services. More friendly social neighbourhoods needed. Not enough money invested in health care.

More school places for Primary and Secondary.

More schools needed.

More sports facilities.

More supermarket choice and toy shop

More support needed for careers and child careers.

More teenage activities and play space.

More youth facilities

More youth facilities needed.

Motorbikes and quad bikes on main road causing issues.

Multipurpose community centre.

Need a health clinic in South Ockendon.

Need a new crossing to reduce congestion near Canvey island.

Need a new hospital.

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Need a new recycling centre in west as agreed with Havering.

Need better bus services

Need better GP provision in Aveley

Need better parks.

Need better transport. More buses and more frequently.

Need for a new Thames Crossing at Canvey.

Need for better evening/night time activities for teenagers and young adults.

Need for better infrastructure, GPs, Schools, Roads and Hospital.

Need for extra services - doctors surgery etc.

Need for housing older people like bungalows/flats to free up family housing.

Need for midrise affordable apartments.

Need for midrise affordable apartments.

Need for more buses in Aveley.

Need for more one bedroom flats, there are none on the market.

Need for more school places.

Need for more toilets in parks and public spaces.

Need for quality social housing for young people.

Need for social housing.

Need GP facilities and hospital.

Need improvement to bus routes.

Need investment in centres and shops.

Need more doctors, dentists and health provisions.

Need more doctor's dentists and schools.

Need more employment opportunities in IT.

Need more facilities for young people. These facilities should be maintained by the Council.

Need more family pubs and restaurants.

Need more farming and residential areas and need to safeguard character and personality.

Need more infrastructures to support existing and new housing.

Need more nurseries.

Need more nursery places. Since school nursery closed existing nursery doesn't have capacity.

Need more rental accommodation.

Need more skilled professional jobs available.

Need new housing but it shouldn't be built next to motorways or on flood plains and it need to be designed in the right way especially in rural areas.

Need public toilets on high streets during opening times.

Need specialist housing for older people

Need to bring jobs and industry back into area.

Need to build on brownfield land.

Need to free up sheltered accommodation by moving people to extra care facilities.

Need to increase capacity of Dr surgeries - difficult to get appointment.

Need to know where S106 is spent

Need to meet with utilities.

Need to regenerate some areas - new better quality homes.

Need to retain street and community trees.

Need to think about phasing and infrastructure delivery.

Need youth centre and activities.

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New crossing not needed in Thurrock.  
New crossing should link to A130.

New development in Thurrock needs to be spread around more evenly. Appears to be a preference to build south of AB.  
New facilities need to be provided alongside new housing.

New homes sit in Thurrock.  
New homes so need more facilities. Health provision not good. Facilities for young people needed.

New houses in keeping with the area.  
New housing developments need to make allowances for families with numerous cars.

New housing in Aveley is going to outsiders rather than local Thurrock people  
New housing needs to be built near public transport.

New housing not keeping with the village character  
New railway station.

No 2nd crossing in Thurrock.  
No children park in East Tilbury.

No crossing in Thurrock.  
No development needed on existing green belt.

No gated communities.  
No green belt to be built on.

No late night consultation venues - after 7pm.  
No local jobs in Chadwell.

No Lower Thames Crossing is needed but not sure if can be stopped.  
No lower Thames crossing.

No more expansion of Tilbury Port.  
No more houses in Thurrock.

No more overdevelopment in Purfleet area.  
No need for a new river crossing, one is enough.

No new crossing is needed.  
No new crossing needed in Thurrock.

No places for kids over 15 or under 5 to play safely.  
No places for young people.

No places to go in the evening.  
No point in giving gypsies a fixed site; it's not what they are about.

No pride.  
Nowhere to "downsize" and stay in neighbourhood need housing for older people - bungalows.

Noise and Air pollution  
Not a good area at the moment to live because of lack of amenities.

Not against development needs to be in right location.  
Not against development - provide more jobs locally.

Not enough community facilities or places for groups to meet.  
Not enough schools need secondary schools.

Not enough services for the number of houses going up.  
Not enough social and council houses.

Not enough stuff for teenagers.  
Nothing around for young people. Bus services are poor.

Obesity especially in young people needs to be addressed.  
Open space improvements needed  
Open space near centre/social club - could be used for car parking.  
Option 3, route 4 on river crossing will go over an area of heritage.  
Overspill from London causing housing issues.  
Park provision closer for younger ones.  
Park security and safety is a big concern. Some parks don't have fences around them and some are not suitable for mothers with pushchairs (narrow gates).  
Parking and road infrastructure.  
Parking around schools is a big issue.  
Parking at school awful now with all new housing.  
Parking on grass verges  
Parking problems in residential streets.  
Part time jobs and child care.  
Passenger capacity on existing trains.  
People to take more care of their surroundings.  
Plan should be written in understandable language for ordinary people.  
Please consider impact on emergency services.  
Pollution issues - plant more trees to green borough.  
Population changes and need for new housing.  
Positive activities for young people. Somewhere they can access advice.  
Positives in Corringham - Good facilities, schools are good, found a home easily, and air quality better than London, rural character.  
Pot holes.  
Potential for more jobs at London gateway but need to know numbers.  
Potential new crossing is to near existing.  
Project green spaces  
Promote brownfield sites.  
Promote Thurrock move.  
Protect community facilities and assets.  
Protect green belt.  
Protect open spaces in urban areas.  
Provisions for teenagers  
Public realm improvements and street furniture.  
Public realm in Stanford-le-Hope centre is very poor.  
Public realm needs improving in centres.  
Public spaces should be safe guarded for general public even they are built and maintained by private developers.  
Public transport to expensive.  
Purfleet regeneration area could do with more leisure and activities.  
Purfleet regeneration.  
Quality of roads needs to improve.  
Railway crossing stays closed for a long time. Needs a bridge.  
Railway crossings - barrier a problem.  
Regeneration is needed near Broadway.  
Regeneration of Dewant parade is much needed.  
Road and rail improvements needed.



Road infrastructure a priority.  
Road maintenance in tilbury.  
Road maintenance needs to be improved.  
Road maintenance.  
Road maintenance.  
Roads and traffic.  
Roads cleaned - road sweepers needed and attention to verges.  
Roads in general. Bring back employment jobs to the area.  
Roads infrastructure - roads not changed even though many more houses.  
Rubbish and quality of environment is poor and awful.  
S.106 Negotiations are poor and not executed in the right way.  
Safe walking routes to schools and schools near where people live.  
Safer - More police and hub.  
Safety around Chafford station and lakeside  
Sainsbury's roundabout is a nightmare.  
School need improving.  
School places and faith schools are important.  
Second crossing sensible part would be to go in Woolwich.  
Shopping mall needed in tilbury as would create job opportunities.  
Shortage of quality jobs for young people  
Smaller housing needed for downsizing.  
Sports hall attached to school - community use after school hours.  
Stability and someone to listen. Always have to put a petition in when things under threat.  
Still waiting after 20 years for the promised hospital.  
Stop Thurrock from being a dumping ground.  
Strong sense of community in Chafford.  
Sub-letting of properties.  
Suitability of housing 2bed + proper space standards  
Support co-location of emergency services.  
Support co-location of facilities school/health/community uses but needs to be designed in the right way with good access.  
Support Grays Masterplan but nothing will happen until the marina is developed.  
Support housing growth - affordable but needs infrastructure - GPs overstretched.  
Table tennis tables or similar would be a great asset to the community hubs or outside when parking spaces are not being used.  
Take into account the loss of individual community's identity.  
Teenage activities and facilities are needed.  
Teenage and young people need activities and facilities.  
Teenagers and anti-social behaviour.  
The bus service is not bad but the cost is an issue.  
The decisions have already been made. I don't believe my opinions or anybody else's matter to the Council.  
The heath is a good local space but need stuff for older children.  
The level crossing is a problem. Lon freight trains hold everyone up including ambulances.  
The local church is well used which is why it's got all the funding for renovation but the other parts of Aveley are in poor conditions.  
The local roads were not designed to deal with all the lorries some are not even local.

The need to change council targets from housing completions to housing applications approved.

The railway crossing is a problem. Can be delayed and a long time sitting waiting.

The riverside in Grays is a big asset but there is nothing down there to do and enjoy.

The Thames crossing is an issue for local people.

The Thames crossing.

The waterfront is very underused, poorly designed, not public friendly, no views, no uses.

There are large areas of marsh which we should make use of.

There is a need for a new crossing.

There is much land in green belt that is rubbish - then they say there is not enough land for housing.

There should be night time leisure locations.

Tilbury Port needs to contribute more to community infrastructure and highways improvements.

Tilbury regeneration.

To make best of our location we should have better connection to the river and uses for waterfront area.

Too many betting shops.

Too many HGV movements.

To many houses not enough services.

Too much anti-social behaviour.

Too much graffiti

Too much traffic into and through the village.

Too much traffic. Anti-social behaviour of drunken adults. Road maintenance and cleaning.

Capacity of local clinics has reached limit.

Too many houses not enough community facilities.

Too many new houses not enough facilities

Too much heavy traffic on smaller local roads, litter on main road also very bad.

Traffic is an issue - it has got worse since lakeside opened.

Traffic management is not good enough around the schools. Ambulances struggle to move through traffic.

Traffic problems in Thurrock already high which causes air pollution.

Transport and access onto London road.

Transport scheme to route traffic cases from residential areas.

University of west of England. Brownfield land, green belts, demographics, commissioned by our save our green belt group. Is the local plan taking note of this?

Upgrade existing rail network. Port - upgrade roads and rail.

Viability.

Village appears dirty, broken paving, lack of being looked after - viscous circle area continues to decline - people are beginning to not care.

Villages don't have good transport links.

Walking is a great activity but routes are poor.

Walking routes are overgrown and need better maintenance.

Where are the services to match a growing population

Why can't people have meetings with chief executive?

Why is housing need so high in the south east?

Why not use one of the old BATA factory buildings for small studio's

With an increasing number of housing a balanced number of jobs and recreational, cultural facilities should be developed as well to avoid it becoming a commuter town without life.

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You try to encourage people to involve but what's the point if the same old issues have never been resolved.

Young people don't have a voice and it is difficult to engage them.

