

# **Thurrock Local Plan**

## **Appendix 1 - Issues and Options (Stage 2)**

**JULY 2018**

## **INFORMATION**

### **How can I have my say on this consultation document?**

Consultation on the Local Plan – Issues and Options (Stage 2) document and the Integrated Sustainability Appraisal (ISA) will commence at 9am on Monday 30 July 2018, with the consultation period closing at 5pm on Friday 14 September 2018. All responses should be made on-line via the Council's interactive consultation portal. If you do not have access to the internet, a paper comments form will be made available on request at the Civic Offices and in all libraries in the Borough.

If you need help with your representations or wish to discuss either the content of the consultation documents or how to submit your comments, please contact the Growth and Strategy team by email: [growth&strategy@thurrock.gov.uk](mailto:growth&strategy@thurrock.gov.uk). There will also be opportunities to meet with members of the Growth and Strategy Team, face-to-face, at the 'Your Place, Your Voice' community planning days that are being held throughout the consultation period. Please visit our website for details on times and locations at [www.thurrock.gov.uk/localplan](http://www.thurrock.gov.uk/localplan).

### **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 with consultees. Comments will be published on the Council's consultation portal in accordance with the Data Protection Act and the representations made will be used to inform the next stage of the plan making process.

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# SECTION 1: INTRODUCTION

## What is the Thurrock Local Plan?

At the heart of planning and place-making is the need to plan positively for sustainable development and future economic growth. One of the most important ways that can be achieved is by having an up-to-date local plan to guide the development of the area and coordinate the provision of supporting infrastructure.

Thurrock Council is preparing a new Local Plan that will set out the amount and location of new development across the Borough in the period up to 2037/38.

The Local Plan will address Borough-wide strategic planning issues such as deciding which towns and villages should grow, and the quantity and type of new homes, jobs, services and infrastructure that are needed. The Local Plan will also cover detailed planning issues such as deciding which specific sites should be developed and what policies are needed to ensure that new development is well designed and that our built and natural heritage is protected and, where possible, enhanced.

On the xx of June/July the newly formed Asociation of South Essex Local Authorities (ASELA) announced that the constituent authorities (Basildon, Brentwood, Castle Point, Rochford, Southend-on-Sea, and Thurrock) had agreed to collaborate on the process of preparing a new Joint Strategic Plan (JSP) to cover their administrative areas. The JSP will set out a wider vision and spatial strategy for the development of South Essex including a range of high level strategic policies which will establish the scale and distribution for new housing, employment, retail and town centre development across South Essex, together with supporting infrastructure priorities over the plan period to 2037/38. Although the JSP will identify a range of broad strategic locations and priorities for new development and infrastructure delivery, it will not allocate specific sites for development which will continue to be determined locally through the Local Plan process and community involvement.

All development plans including the Joint Strategic Plan and the Local Plan must be positively prepared, justified, effective and consistent with Government policy set out in the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG).

Whilst the Council does have an adopted Local Plan in place, in February 2014, the Council decided to commence work on a new Local Plan in order to respond to a number of major challenges. These included:

- The need for a more up-to-date statutory planning framework to co-ordinate the delivery of the Council's ambitious growth strategy for Thurrock
- The revocation of the East of England Plan and the requirement for local planning authorities to undertake a fresh assessment of their future development needs
- The need for the Council to identify a deliverable five year housing land supply and bring forward more sites for development to support economic growth
- A need to consider the possible impacts of a decision by Government on the route and location of the proposed Lower Thames Crossing (LTC)

## What is this consultation about?

The first consultation on the new Local Plan, Issues and Options (Stage 1) Consultation Document (I&O1), was published in February 2016 and focused on thematic policy areas. The purpose of the Issues and Options (Stage 2) consultation is to seek your views about how Thurrock should develop

and grow in the future and where, in broad terms, new development should be located to meet identified needs. It is important to note that this consultation is not concerned about which specific sites should be allocated in the Local Plan for development. However, following this consultation and based on the responses received, a preferred broad spatial strategy for accommodating Thurrock's future needs will be developed and consulted on. This further consultation (likely to be in the summer of 2019) will strongly influence decisions about which sites should be developed.

### **How will the Local Plan be prepared going forward?**

Preparation of the Local Plan must follow a number of stages to ensure that local people and stakeholders are fully engaged in the process and its content is based on robust evidence, the proper consideration and testing of alternative strategies and then finally, external examination by an Inspector appointed by the Secretary of State. These stages of work are summarised in **Figure 1**.

It is anticipated that the Local Plan will be adopted by the Council in 2021. However, due to the nature of the work involved, the programme for preparing the plan will need to be kept under regular review as it cannot be submitted for examination and adoption until after the conclusion of both the adoption of the JSP and Lower Thames Crossing decision-making process.

#### **Figure 1- Local Plan Stages of Preparation**

- **Scoping Content and Evidence Development**
- **Issues and Options (Stage 1) – February 2016**
- **Issues and Options (Stage 2) – July 2018**
- **Draft Local Plan – September 2019**
- **Publication Draft Local Plan – September 2020**
- **Submission and Examination – From February 2021**
- **Adoption – September/October 2021**

#### **INFORMATION**

For more details on the Local Plan work programme please see the latest Local Development Scheme (LDS) ([www.thurrock.gov.uk/localplan](http://www.thurrock.gov.uk/localplan) ).

### **How will communities and key stakeholders be involved in the process?**

Community and stakeholder engagement is an important and central feature of the planning system. The Council is keen to engage as many people as possible in the preparation of the Local Plan as it enables local people with local insight to become directly involved in place shaping in the Borough.

As part of the process, the Council will be preparing a Statement of Community Involvement (SCI) which will set out how all sectors of the community can become involved in the planning process and

how the Council will maximise publicity of its planning documents. Consultation mechanisms include, but are not limited to:

- Making consultation documents available on the Council's website;
- Providing hard copies of consultation documents for inspection at the Civic Offices in Grays and in libraries across the Borough;
- Continuing engagement through the Local Plan Residents Forum, Youth Forum, Developer Forum and Business Forum;
- Organising 'drop in' events via the 'Local Plan Roadshow' to allow people to come along and share their views in person;
- Setting up online polls to allow more people to have their say on the big questions;
- "Your Place, Your Voice" – Community 'Planning for Real' consultation events; and
- Duty to Cooperate Workshops for key stakeholders.

#### **INFORMATION**

The Local Plan Forums run quarterly and have been created to ensure that the plan is influenced by local people, businesses and key stakeholders. Forum members will be involved throughout the preparation of the Local Plan, interrogating evidence and being party to the challenging decisions which need to be made at each stage of the plan-making process.

If you are interested in joining one of the Local Plan Forums, please contact a member of the Growth and Strategy Team using the details at the back of this document.

All consultation responses received, together with a summary of how they have been taken into account in the preparation of the Local Plan, will be recorded in the Thurrock Local Plan Consultation and Engagement Statement, which will be submitted to an Inspector for consideration as part of the Local Plan Examination process. This document will be published alongside each stage of the plan-making process so that people can see how their views are helping to shape the development of the Local Plan.

#### **What information will be used to inform the Local Plan?**

Local Plans must be based on robust evidence about the economic, social and environmental characteristics and prospects of the area. Much of the evidence is of a technical nature and is not described in detail in this document. Key pieces of evidence currently being prepared include:

#### **Technical studies completed/commissioned include:**

- South Essex Housing Market Assessment 2016
- South Essex Housing Market Assessment Addendum Report 2017
- Thurrock Housing Land Availability Report 2017

- Thurrock Green Belt Assessment 2017/18
- South Essex Economic Development Needs Assessment 2017
- Thurrock Employment Land Availability Assessment 2017
- South Essex Retail Study 2018
- Thurrock Town and Local Centre Health Check Assessment 2018
- Thurrock Active Place Study 2017
- Thurrock Whole of Plan and CIL Viability Baseline Study 2017
- Thurrock Development Capacity Study
- Thurrock Housing Opportunities Study
- Thurrock Strategic Flood Risk Assessment Update
- Grays Town Centre Area Development Framework Update
- Thurrock Integrated Landscape Character Assessment and Sensitivity Evaluation
- Thurrock Green Belt Stage 1 Assessment

**Technical studies to be commissioned include:**

- Lakeside Area Development Framework Update
- Thurrock Transport and Infrastructure Baseline Study
- Thurrock Vision for Movement

Further information on how some of the emerging studies and their findings and conclusions are already helping to shape the plan-making process is described in more detail in the following sections of the Consultation Document.

**INFORMATION**

If you would like to read or obtain a copy of these technical studies and reports they can be found on the Council's Local Plan website - [www.thurrock.gov.uk/localplan](http://www.thurrock.gov.uk/localplan)

**QUESTION 1**

**As the development of the Plan progresses additional evidence will need to be prepared. What other evidence based studies do you think the Council needs to consider undertaking to ensure that the Plan is sound?**

**Call for Sites**

A key early stage in the plan-making process is the requirement for local authorities to undertake a formal 'Call for Sites', whereby landowners, stakeholders and the local community are invited to identify sites or broad areas of land for development. Any locations identified through this process by respondents will then be assessed and considered further by the Council for allocation within the emerging Local Plan.

To date, the Council has undertaken three 'Call for Sites' which has led to over 250 sites and broad locations being submitted for consideration as part of the plan-making process. This has been supplemented by a range of sites that have been previously considered in other plans or submitted as planning applications. This includes sites suggested for a wide range of uses to meet Thurrock's future housing, gypsy and traveller, employment, retail, leisure, and waste and minerals needs.

**Figure 2** maps out the distribution of sites and the broad mix of uses which are being considered for allocation through the plan-making process.

### **Figure 2 – Local Plan Site Assessment Map (All Uses)**

**[Insert Map]**

#### **INFORMATION**

Further information, including details on how to submit a site or broad location for consideration by the Council, can be found on the Council's Local Plan website ([www.thurrock.gov.uk/localplan](http://www.thurrock.gov.uk/localplan)).

### **How will the Local Plan relate to other Plans and Strategies for the area?**

Partnership working and co-ordination of strategies are key features of the planning system. The Council is therefore liaising with relevant bodies who also prepare strategies which have an impact on the Borough. This includes those organisations involved in the delivery of health, education, transport and environmental services together with those companies involved in the provision of public utilities. This is to ensure that the plans and strategies of all these key delivery partners are consistent and in broad alignment with the emerging local plan strategy, thereby ensuring the provision of necessary supporting infrastructure at the right time and in the right place to support Thurrock's future growth aspirations.

### **How will the Local Plan relate to the Plans of neighbouring authorities?**

The Council is working jointly on strategic priorities with other authorities in South Essex, London and beyond. This is known as the Duty to Cooperate. The duty to cooperate was created in the Localism Act 2011 and places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local and Marine Plan preparation in the context of strategic cross boundary matters.

The duty to cooperate is not a duty to agree. But local planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination.

Local planning authorities must demonstrate how they have complied with the duty at the independent examination of their Local Plans. If a local planning authority cannot demonstrate that it has complied with the duty then the Local Plan will not be able to proceed further in examination.

Local planning authorities will need to satisfy themselves about whether they have complied with the duty. As part of their consideration, local planning authorities will need to bear in mind that the cooperation should produce effective and deliverable policies on strategic cross boundary matters.

Thurrock forms part of the South Essex Housing Market Area and as such the Local Authorities already work very closely together on planning for housing, economic, transport, flood risk and infrastructure delivery and growth. By virtue of its proximity to London and its strategic location next to the M25 and the Dartford Crossing, the wider geography for engaging through the Duty to Cooperate process also includes working with the London Mayor's Office and the Greater London Authority

(GLA), together with local authorities across Essex and North Kent on a range of Duty To Cooperate matters, including housing, transport and minerals and waste issues.

Through the ongoing development of the Local Plan evidence base and discussions with the various Duty to Co-operate bodies the Council has identified a series of key cross boundary issues which both the wider strategic plan-making process and the Thurrock Local Plan will need to consider and address. These are summarised in **Figure 3** below.

**Figure 3 - Cross Boundary Issues**

- Planning to meet future housing needs – the scale and distribution of development across South Essex
- Addressing the needs of Gypsies and Travellers and Travelling Showpeople
- Planning for economic growth – the scale and distribution of development and required infrastructure improvements
- Managing the development of the strategic network of Centres – scale, distribution and phasing of growth
- Recreation and leisure provision
- Infrastructure planning and delivery – identification, funding and phasing of strategic and local infrastructure provision to support growth (transport, utilities, community, health, education, leisure and digital infrastructure)
- Training, skills and accessibility to employment opportunities
- Maintaining the integrity of the Metropolitan Green Belt
- Strategic Green Infrastructure – management, maintenance and protection of strategic assets
- The River Thames
- Protecting and conserving the historic and natural environment
- Managing Flood Risk
- Climate Change
- Minerals and Waste – Thurrock’s future role in meeting local, regional and national needs
- Potential Lower Thames Crossing
- Potential Thames Tidal Barrier
- Cross Rail 2

## **QUESTION 2**

**Do you feel that all of the relevant cross boundary issues have been identified? If not, please state what the other key strategic issues that the Council will need to consider and address with stakeholders and partners are.**

## **South Essex 2050 Ambition**

***“South Essex: the place to live, the destination to visit and the place for business to thrive”***

In the Autumn of 2017, the Leadership of the South Essex Councils (Basildon, Brentwood, Castle Point, Rochford, Southend and Thurrock) embarked upon a programme of work which would lead to a shared ‘place ambition,’ and greater collaboration on strategic priorities to support long term growth across South Essex. This was initiated in response to recognition that there were a need to work

more effectively on strategic planning matters across South Essex and maximise the, potentially significant, opportunities that strategic collaboration could bring to the area.

The 'South Essex 2050 Ambition' sets out how growth and development will be distributed across the sub-region and the positive effect it will have on the economy, together with a coherent framework for delivery of the right type and scale of infrastructure to support growth. Operating together, the South Essex strategic growth assets could provide the infrastructure for people and businesses to experience a fully connected place (nationally and internationally) where they can take advantage of the unrivalled potential on offer in one area – business growth, employment opportunities, varied and interesting communities to live in and a rich diversity of cultural and recreational experiences to enjoy.

By 2050, the ambition is that all new development will be located in the most sustainable locations, will be of the highest quality, will support the emerging local industrial strategy priorities and will be well-connected by a fully integrated transport system and framework of green spaces. The current estimated need for housing across South Essex is 90,000 dwellings over the next 20 years but with the right conditions to support growth, more could be achieved. As part of the consideration of long term spatial options, the authorities are therefore exploring whether the development of new 'Garden' communities could offer a strategic solution to growth. The new communities could significantly enhance housing opportunities and community facilities for local people, and support new commercial and employment hubs, creating centres of business excellence within the sectors of industrial opportunity.

#### *South Essex Strategic Areas of Opportunity*

Six areas of strategic importance have been identified as places that, with the right investment and leadership, offer the greatest potential to deliver the South Essex 2050 Ambition. The 'Strategic Areas of Opportunity' are illustrated diagrammatically in **Figure 4**.

#### **Figure 4: South Essex Strategic Areas of Opportunity**

Insert Map indicating SAOs

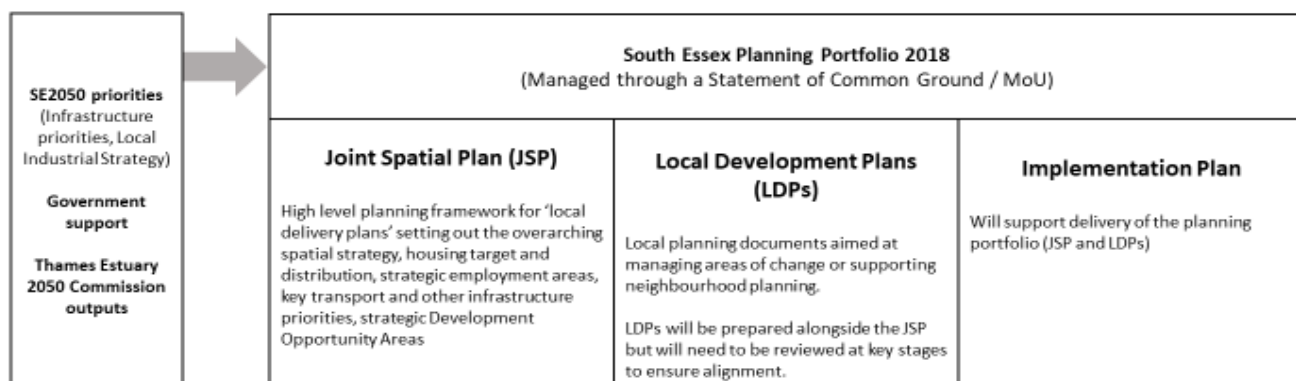
- The River Thames and Thames Estuary
- London Southend Airport and surrounding area
- A127 Transport Corridor
- Crossrail connectivity/A12/A129
- Thurrock Thameside and A13 Corridor
- Lower Thames Crossing Corridor

#### **Implementing the South Essex 2050 Ambition**

Implementation of the South Essex 2050 Ambition will be steered through the Association of South Essex Local Authorities (ASELA) and a number of inter-related workstreams have been initiated to do this. These cover strategic infrastructure priorities, a local industrial strategy, developing a 'South Essex' growth proposition and the development of a statutory Joint Strategic Plan. A Statement of Common Ground (SoCG) sets out how the spatial strategy workstream will be implemented through a new local planning 'portfolio', with a Joint Strategic Plan providing the overarching framework within which more focused local development plans will be prepared (see **Figure 5** below).

The JSP will also provide a reference framework for the preparation of a Strategic Transport Framework, to sit under the three current statutory Local Transport Plans (LTPs) and to form part of the JSP. The Strategic Transport Framework would be prepared by the three Highway Authorities for South Essex, namely Thurrock and Southend Unitary Authorities and Essex County Council, with partners including the local planning authorities.

**Figure 5: The South Essex Local Plan Portfolio**



## Scope and focus of the South Essex Joint Strategic Plan (JSP)

The South Essex 2050 Ambition will be delivered over the next 30 years, with some of it fully realised within the timeframe of the current South Essex JSP (period 2018-2038). Other longer-term components will be delivered beyond this timescale but will be included in future reviews of the JSP, as the plan's timeframe is rolled forward.

The JSP will provide the strategic context for the statutory development plan portfolio and will be prepared jointly by the South Essex Councils and Essex County Council. Its scope will therefore be focused on the strategic policy matters that are common across all six local planning areas as follows:

- **South Essex Spatial Strategy:** distribution of growth, strategic housing and employment development locations, town centre hierarchy and setting the long term extent of the Green Belt
- **Strategic Areas of Opportunity (SAO)** and the role of each
- **Cross-cutting themes:** including promoting social cohesion; healthy and inclusive growth; high quality development and design; supporting sustainable development; climate change
- **Overall levels of housing provision** to be provided throughout the plan-period (and to 2050)
- **Local industrial strategy priorities** and spatial implications (including what type of employment land is needed and where).
- **Strategic transport and infrastructure** priorities
- **Natural environment and resources**, including green and blue infrastructure, flood risk
- **Implementation and Monitoring Framework**

The South Essex Local Planning Portfolio will also rely on the policies set out in the National Planning Policy Framework (NPPF) and will therefore not duplicate any nationally set policies, unless there are specific local circumstances that justify a deviation from this. However, there may be a need for supplementary planning guidance in addition to the NPPF, to provide a local interpretation and implementation of national policy.

The JSP will provide the strategic framework for the preparation of detailed Development Plan Documents (DPDs), as appropriate, which will provide more detailed planning policies and perform an essential place-shaping role, particularly with regard to delivery within the Areas of Strategic Opportunity. The additional DPDs prepared as part of the South Essex Planning Portfolio will be set out in the individual Local Development Schemes.

### **Minerals and Waste Planning**

Planning for minerals and waste is the responsibility of Thurrock and Southend Councils, and Essex County Council. This is managed through separate local planning processes and will therefore not be part of the JSP. A separate SCG will be prepared to help manage the strategic minerals and waste planning matters across South Essex.

### **Timetable and key milestones**

The South Essex Authorities have agreed an accelerated timetable for preparing the plan given the urgent need to implement the shared ambition, build investor confidence and ensure the right infrastructure is secured to support delivery of the strategic spatial and economic priorities. The key milestones for preparing the JSP are set out below. A detailed work programme has also been agreed to help manage the JSP preparation across the seven local authorities and ensure it continues to be treated as a priority by all involved.

#### **SOUTH ESSEX JOINT STRATEGIC PLAN – KEY FUTURE MILESTONES**

**July 2018:** All South Essex LPAs and Essex County Council agree Final Statement of Common Ground and JSP Statement of Community Involvement (SCI).

All South Essex LPAs update their Local Development Schemes (LDS) to reflect the Local Plan Portfolio.

**Spring 2019:** The Draft JSP with spatial strategy options (including preferred option) is published for Regulation 18 Consultation, in line with the SCI and agreed JSP timetable.

**November 2019:** The South Essex Draft JSP is agreed by all South Essex LPAs based on recommendation by ASELA

**December 2019:** Final draft version of JSP is published for Regulation 19 Consultation

**March 2020:** JSP submitted for Examination

**Autumn 2020:** JSP adopted by all South Essex LPAs

## **The Strategic Evidence Base**

In order to inform the preparation of the JSP, the South Essex Councils have commissioned a number of strategic housing, economic, retail, transport, infrastructure and open space technical studies. This includes the production of a Strategic Growth Locations Study which will set out a range of strategic options for meeting South Essex's future housing needs over the period to 2038 and beyond to 2050. The Study will identify potential strategic locations for growth and provide a high level assessment of the infrastructure needs, costs and delivery mechanisms associated with each of the broad locations identified for development as part of the preferred option set out in the JSP. It will then fall to each of the South Essex Council's to further develop and plan for their delivery through the Local Plan process.

Further information on the JSP process and details of the emerging evidence base can be found on the ASELA website at the following address. **[Add website details when available]**

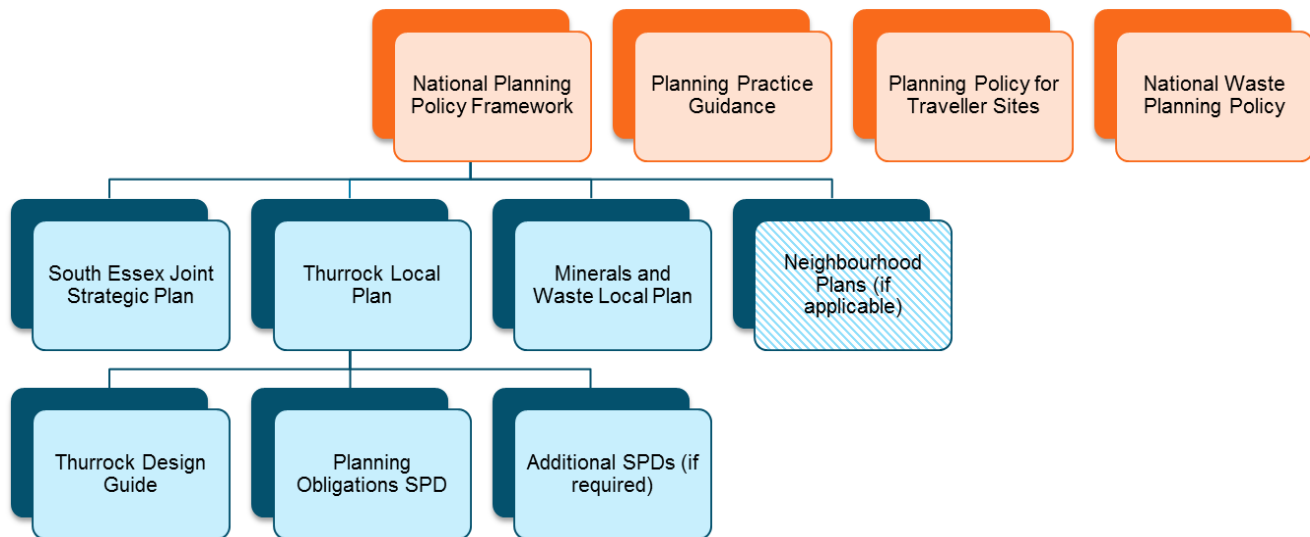
## **Relationship of the Thurrock Local Plan to the South Essex Joint Strategic Plan (JSP)**

It is intended to submit the JSP for Examination in March 2020 with its adoption targeted for late 2020. In parallel, the South Essex authorities are also twin tracking the production of their own individual Local Plans which will need to plan for the delivery of the strategic development needs identified by the JSP at the local and site specific level.

Reflecting the decision to prepare the JSP, the Council is required to publish a new Local Development Scheme (LDS) which sets out the suite of Development Plan Documents (DPDs) which will be prepared to guide the future development of the Borough.

Published alongside this Issues and Options Stage 2 Consultation Document, the Thurrock Local Development Scheme July 2018 sets out the programme and key milestones involved in preparing the JSP, the Thurrock Local Plan, supporting DPDs and non-statutory Supplementary Planning Documents (SPDs). **Figure 6** below sets out the proposed suite of DPDs and SPDs which it is proposed to prepare for Thurrock along with their anticipated commencement and adoption dates.

**Figure 6: Proposed Thurrock LDS Development Plan and Supplementary Planning Documents**



Both the evidence collected for the Thurrock Local Plan and the public responses received in respect of the Issues and Options (Stage 2) Consultation process will be used to help inform the development of the JSP. This will include the identification of broad strategic areas for development and any key supporting strategic infrastructure improvements required to support their delivery.

#### **INFORMATION**

A copy of the Thurrock Local Development Scheme 2018 (LDS) is available to view on the Council's Local Plan website. ([www.thurrock.gov.uk/localplan](http://www.thurrock.gov.uk/localplan)).

### **What are Neighbourhood Plans and how will the Local Plan affect them?**

The Localism Act 2011 introduced new rights and powers to allow local communities to shape how their local areas develop and change by preparing a Neighbourhood Development Plan (NDP) or Neighbourhood Development Orders (NDOs). In Thurrock, only designated Neighbourhood Forums are able to produce an NDP and NDOs.

Through producing a Neighbourhood Plan, communities can take the lead on developing planning policies for their local area, as long as certain rules are followed and any Plans and policies are in general conformity with the strategic policies set out in the Local Plan.

## **INFORMATION**

At the time of publication, the Council has not received any formal applications by community groups to be designated as a Neighbourhood Forum and/or received any official requests for support.

If you or your local community are considering producing a Neighbourhood Plan, we would recommend that you speak to a member of the Growth and Strategy Team in the first instance. Contact details can be found on the back page of this document.

## **What is the status of the Core Strategy and other planning policy documents now the Council is preparing a new Local Plan?**

The Council adopted the Core Strategy and Policies for Management of Development Local Plan (Core Strategy) in December 2011. The Core Strategy sets out the Council's vision, spatial strategy and core policies for the development of Thurrock.

Following the publication of the National Planning Policy Framework (NPPF) in 2012, the Council identified a number of policies in the Core Strategy which required updating to ensure that they were in full compliance with the NPPF. These policies were adopted by the Council in January 2015.

The policies within the Core Strategy will continue to be used in decision making until the Thurrock Local Plan is adopted. However, as work on the Local Plan progresses, emerging policies could start to influence decisions on planning applications. Once the Thurrock Local Plan is adopted it will replace the Core Strategy. All recently adopted Supplementary Planning Guidance documents, including the Thurrock Design Guide, will also be revised in parallel with the preparation of the Local Plan to ensure the proper alignment of policy across all planning documents.

## **Minerals and Waste**

As both a Unitary and Minerals and Waste Planning Authority (MPA), Thurrock is required to plan for the provision of an adequate and steady supply of mineral resource to meet future needs and the management of waste in accordance with the principles of sustainable development.

At a local level, extant minerals and waste planning policy guidance is set out in the Thurrock Core Strategy and Policies for Management of Development (January 2015). However, it is recognised that there will be a need to up-date the existing policy approach to better align with future growth needs and changing national policy requirements. In order to address this, the Council is proposing to prepare a separate and stand alone Thurrock Minerals and Waste Local Plan as an alternative to the inclusion of new policy guidance within the body of the emerging Thurrock Local Plan. Adopting this approach would provide the Council with greater flexibility in order to better align the wider minerals and waste planning process across Essex.

## **How will the Council assess the environmental impacts of the emerging Local Plan?**

Undertaking a Sustainability Appraisal (SA) of the Local Plan is an essential part of the plan-making process. The sustainability appraisal must address the legal requirements of the Strategic Environmental Assessment (or SEA) Directive. A failure to undertake the sustainability appraisal properly can expose the Plan to legal challenge.

The SA of the emerging Local Plan will be an Integrated Sustainability Appraisal (ISA). This will incorporate the requirements of the SA/SEA process and, in line with statutory requirements and best practice, will also include a:

- Health Impact Assessment (HIA) – an examination of the plan’s impacts on people’s health and well-being; and an
- Equalities Impact Assessment (EqIA) - an examination of the plan’s impact on different groups in the community.

Sustainability Appraisal (SA) is an iterative process which is closely integrated with the overall process of preparing a Local Plan. Its role is to promote sustainable development by assessing the likely significant effects of the plan and the extent to which the plan, when judged against reasonable alternatives, will help or hinder the achievement of relevant environmental, economic and social objectives. The staged approach to SA is designed to align with each key stage of the plan-making process.

In February 2016 the Council issued a Local Plan SA Scoping Report for public consultation alongside the Issues and Options (Stage 1) Consultation Document. The purpose of the Scoping Report was to set the context and objectives which would form the baseline for the SA and to determine the scope of the study. Following the close of the consultation period, the Council has amended the Scoping Report, where appropriate, to reflect the comments of respondents. These changes consist of additional appraisal guide questions and changes to the SA Objectives. In addition to the requirement to undertake a Sustainability Appraisal of the Local Plan, the Council is also required to prepare a Habitat Regulations Assessment (HRA) which will provide an examination of the plan’s impact on the EU designated Ramsar site along the Thames riverside.

#### **INFORMATION**

As required by legislation, an Integrated Sustainability Assessment (ISA) has been prepared to inform consideration of the Issues and Options (Stage 2) Consultation Document. A copy of this document and the revised SA Scoping Report is available to view on the Council’s Local Plan website. ([www.thurrock.gov.uk/localplan](http://www.thurrock.gov.uk/localplan)).

#### **INFORMATION**

The Council also intends to set up an external Integrated Sustainability Assessment Stakeholder Reference Group to facilitate the wider involvement of prescribed Duty to Co-operate bodies and other organisations in the process of preparing the ISA. The Council would welcome nominations from all interested parties to become Members of the ISA Stakeholder Reference Group.

For further details on how to be involved please contact the Growth and Strategy Team using the details at the back of this Document.

### **What will happen if we don’t prepare a new Local Plan and meet our future development needs?**

The Government has legislated through the Neighbourhood Planning Act 2017 the requirement for all areas to be covered by a Local Plan.

Where a local authority fails to meet this requirement, the Secretary of State has the power to intervene and direct the review and/or preparation of a Local Plan which, depending on the

circumstances, could be undertaken by another authority or jointly in partnership with surrounding authorities. In all instances, the failing authority could be liable to pay the full or a proportion of the costs involved in producing the Local Plan.

The National Planning Policy Framework requires Local Plans to identify a supply of specific deliverable sites to meet the housing needs of the area for 5 years, with a further supply of developable sites (or at least locations for them) for years 6-10 and, where possible, for years 11-15. A Local Plan that does not meet the requirement could be found unsound through the Local Plan Examination process.

The housing White Paper 'Fixing our broken housing market' set out a series of proposals designed to increase the rate of housing delivery across the country. Further detail on a number of these reforms was set out in 'Planning for the right homes in the right places' in September 2017. This included proposals for the introduction of a Housing Delivery Test, whereby local authorities who fail to meet their housing targets by 2018/19 and provide a rolling 5 year housing land supply (plus 20% buffer) will effectively lose their ability to determine where development goes.

The total housing requirement for the first five years of the Plan (2017 – 2022) is 11,400 homes. This takes into account the identified housing need (upper range of OAN), the shortfall of homes delivered between 2014 and 2017 against this figure, and the application of a 20% buffer (moved forward from later in the Plan period) due to the Council's historical record of persistent under-delivery against its housing targets. The Council has identified a current housing supply capable of delivering just 2,635 homes. This equates to a housing land supply equivalent to 1.2 years which means that the Council would be liable to sanction under the proposed Housing Delivery Test.

For those authorities who fail the Housing Delivery Test, there will be a presumption in favour of sustainable development which would make it potentially easier for developers to get planning permission for housing development on appeal to the Secretary of State where it can be demonstrated that the Local Plan is either out-of-date or fails to allocate sufficient land to meet future housing needs. This could lead to sporadic development in the Green Belt and failure to maximise the benefits that future housing growth could bring to the local community.

In addition to the threat of intervention and possible sanctions from Government, an ongoing failure to adopt a sound and deliverable Local Plan would also:

- Increase the amount of local people who struggle to access decent or affordable housing in the Borough;
- Undermine efforts by the Council to boost the supply of affordable housing through a lack of viable and deliverable sites for development;
- Undermine opportunities to support the future regeneration and renewal of existing local centres and communities;
- Prevent the provision of new community infrastructure which needs to be delivered on large sites, such as primary and secondary schools, due to a lack of suitable large sites in the urban area and the constraining nature of the Green Belt boundaries in Thurrock;
- Raise a serious risk that, without an adequate supply of housing to meet workers needs locally, firms could relocate or switch investment to other locations as workforce availability declines. Alternatively, if job growth continues without the necessary housing growth, increased levels of in-commuting are likely to result, thereby putting additional strain on existing transport networks and further congestion on the roads.

## SECTION 2: PREVIOUS CONSULTATION RESPONSES

In February 2016 the Council launched its first formal consultation on the emerging Local Plan. Since this consultation, the Council has undertaken a series of informal consultation activities with communities to deepen its understanding of the issues and opportunities that exist in the borough. A summary of these consultations and the issues they raised are set out in this section.

### Issues and Options (Stage 1) – February 2016

The process for preparing and adopting Local Plans is set out in the Town and Country (Local Planning) (England) Regulations 2012. When preparing a new Local Plan, Regulation 18 directs 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 what a local plan ought to contain.

On 24 February 2016, the Council undertook a 6 week public consultation on the Local Plan Issues and Options (Stage 1) Document, the Local Plan Sustainability Appraisal Scoping Report and the Draft Thurrock Design Strategy. The purpose of the consultation was to obtain the views of stakeholders, local businesses and the community on the key issues that the Local Plan will need to address in order to meet Thurrock's future development needs. In total, 70 organisations responded formally to the Issues and Options (Stage 1) consultation raising 548 separate comments. An additional 500 comments were received from members of the community at events organised to promote the consultation. A summary of the key issues raised by respondents is set out in Table 1. A full record of the comments received and the Officers response to these representations is set out in the Thurrock Local Plan Issues and Options (Stage 1) Report of Consultation which is available to view on the Council's Local Plan website [www.thurrock.gov.uk/localplan](http://www.thurrock.gov.uk/localplan)

**Table 1: Issues and Options (Stage 1) - Summary of key comments**

Comments from Duty to Cooperate bodies
<p>The Local Plan must:</p> <ul style="list-style-type: none"><li>• Consider through the Duty to Co-operate process the need for Thurrock to contribute towards meeting any unmet future housing needs from other authorities, including London and Southend in particular;</li><li>• Ensure that residential developments are supported by health facilities, in order to combat existing health inequalities experienced at a local level;</li><li>• Consider the requirement for Thurrock to make additional provision to meet Basildon's unmet Gypsy and Traveller needs;</li><li>• Support the delivery of the Thames Vision which promotes the retention of riverside industry and employment locations, and the protection and enhancement of the distinctive riverscape in terms of water quality, wildlife and attractiveness as an open</li></ul>

space;

- Consider the impacts of any planned expansion or change to port facilities along the Thames within Thurrock on Medway's port infrastructure;
- Safeguard wharfs in Thurrock for the importation of marine dredged and other mineral resources into the region;
- Consider the future role of Lakeside and the need to manage the scale and nature of its development in order to safeguard the viability and vitality of other strategic centres in South Essex, North Kent and East London;
- Recognise Thurrock's future role in meeting London and the wider South East's waste needs;
- Consider the future implications of strategic transport improvements including the Lower Thames Crossing; and
- Support the delivery of an enhanced public rights of way network accessible to all users (walkers, cyclists, equestrians and the disabled) including increased access to the Borough's open spaces.

### **Comments from Landowners, Businesses and Developers**

The Local Plan process must:

- Consider the development of a new spatial strategy which goes beyond the current approach of focusing investment and development within the existing urban area and the established Economic Growth Hubs in order to meet meets Thurrock's future development needs;
- Undertake a full review of the Green Belt to identify additional land to meet future housing and employment needs consistent with the approach set out in the National Planning Policy Framework (NPPF);
- Consider the allocation of land to meet the future housing needs of London and neighbouring South Essex authorities in addition to meeting Thurrock's own Objectively Assessed Housing Needs (OAHN) in full;
- Consider reviewing the Borough's retail hierarchy and the relative roles of Lakeside and Grays Town Centre in accommodating future strategic retail needs over the plan period;
- Establish a "town centre first" policy approach to the location of town centre uses with a policy to resist further out of centre retail development to support the retail led regeneration of Grays Town Centre;
- Plan positively for growth by supporting the transformation of Lakeside into a regional

town centre with Intu Lakeside providing the best location for new retail (comparison retailing) and leisure development in the Borough;

- Ensure existing centres including Grays and Intu Lakeside can provide for future shopping needs of Thurrock. Further development outside these centres is not required and identified needs should be focused on maintaining and enhancing existing centres;
- Plan positively to maximise the economic benefits that will arise following the development of the proposed Lower Thames Crossing;
- Support the future commercial viability and expansion of the ports through continued investment in new infrastructure, housing, education and skills development;
- Identify additional sites for dedicated truck parks to meet future demand and reduce the environmental and transport impact of logistics related traffic growth on the Borough;
- Recognise the importance of protecting the role played by the River Thames in supporting economic growth;
- Allocate land for the development of new waste and renewable energy facilities which recognises Thurrock's strategic location and the current availability of sites for new development; and
- Recognise the importance and value of Thurrock's green infrastructure and heritage assets in supporting the delivery of wider economic, environmental, health, community and transport objectives.

### **Comments from Local Residents and Community Groups**

The Local Plan process will need to consider:

- The lack of affordable housing available to local people;
- The need for new homes to be built near transport hubs and existing community facilities and services like schools and doctors;
- The need for new homes to be built in areas where they can support the delivery of better community facilities and services;
- The preferred location for new homes should be on brownfield sites;
- The need for better health, education and community facilities to meet local needs;
- The need for more activities to be provided for young people;
- Addressing the adverse impact of lorry movements in residential areas;
- The need for industrial and residential areas to be segregated in order to minimise the

impact of bad neighbour uses on local communities;

- The need for better parking provision in town and local centres;
- The requirement for improved standards of road maintenance and investment in Thurrock's roads;
- The need for better standards of design and a need to tackle the poor quality of the environment and badly maintained public open spaces;
- The provision of new public open spaces and sports and leisure facilities;
- Promoting the delivery of improved walking and cycling facilities; and
- How to address the health impacts of poor air quality on local residents.

### **Watch this Place Washing Line**

Following on from the success of the Local Plan Roadshows and the burning issues board, the Council decided to host some additional Local Plan Roadshows over the summer months in 2016. These events piggybacked on existing festivals that were already being held across the borough. The Council ran an activity titled the 'Watch this Place Washing Line' at these events. The activity involved people writing the things they didn't like about their community/town on a pair of paper pants and the things they did like about their community/town on a paper top. In total this activity generated 462 responses. The majority of comments relating to things that people liked about their local area were focussed on community and environmental assets like open spaces and play areas although there was a recognition that these facilities could and should be better maintained by the Council. In terms of things that people didn't like about their local area, maintenance of the highways and the issue of litter featured prominently. Issues relating to the lack of/poor infrastructure provision were also notable.

### **Your Place, Your Voice Community Planning Events**

The 'Your Place, Your Voice' community planning events were devised in response to comments that residents felt overwhelmed by the technical nature of planning consultations and the volume of council consultations that all seem to ask similar questions. The community planning events were run on a drop in basis, giving local communities the opportunity to feed into the Local Plan and other Council documents and strategies by participating in a range of informal and highly interactive consultation activities.

In total 17 events were held across the borough between February – April 2018. The community planning events highlighted several borough wide and locally sensitive issues and opportunities that need to be considered in the context of the emerging Local Plan. These include but are not necessarily limited to the need to:

- Ensure that the provision of infrastructure is appropriately phased in relation to new development;

- Plan for a range of housing types that address and respond to local needs and priorities – i.e. at the Corringham event it was noted that there was a specific local need for older person's housing;
- Focus on social infrastructure especially facilities for younger people;
- Protect and improve key green spaces within communities;
- Ensure that the integrity to the green belt is maintained;
- Plan strategically for the provision of health facilities across the borough; and
- Address issues relating to the movement of vehicles across the borough, including HGVs.

The Council has produced a findings report for each event area and published the full set of comments as online datasets. Both are available to view on the Council's website.

## SECTION 3: CHALLENGES FOR THE FUTURE

### Key Issues and Challenges

The first task in preparing the Local Plan is to identify the issues or challenges that Thurrock faces. The key issues that the Local Plan needs to address have been drawn out from evidence from local strategies and technical studies, changing national policy, and continued community engagement including the responses received to the previous Issues and Options (Stage 1) public consultation. These sources of evidence have also been used to help develop the vision, identify the objectives and shape the choice of options set out in this consultation document. **Figure 7** below sets out the emerging key Issues and Challenges facing Thurrock.

**Figure 7: Draft Key Issues and Challenges**

- Reducing inequalities in the Borough;
- Improving the attractiveness of the Borough as a place to live, work, visit and invest;
- Securing sustainable economic growth;
- Addressing the need for housing in the context of a probable shortfall across the South Essex strategic housing market area;
- Addressing affordable housing needs across the Borough;
- Providing the right type of housing across the Borough to meet specialist needs and a shortage of Gypsy and Traveller sites;
- Estates and community regeneration;
- Meeting the land and property needs of the business community and Thurrock's major employers;
- Port and logistics development;
- Maintaining vibrant and competitive town centres;
- Provision of activities and spaces for young people;
- Delivering the strategic and local infrastructure improvements required to support growth and the regeneration of existing communities;
- Protecting the integrity of the Green Belt including key gaps between urban areas and settlements;
- Maintaining and protecting the distinctive character and setting of the Borough's villages;
- Preparing for any impacts of climate change;
- Improving access to services, facilities and employment opportunities;
- Relieving congestion which hinders the movement of goods and people;
- Increasing accessibility and encouraging sustainable travel;
- Providing sufficient waste management facilities and providing for future mineral and aggregate needs;
- Improving health and well-being;
- Improving air quality;
- Preventing threats to the character and local distinctiveness of the Borough;
- Protecting and enhancing the Borough's historic, built and natural assets;
- Protecting the key role played by the River Thames as an economic and environmental asset;
- Managing water quality and flood risk;
- Mitigating the impacts of the Lower Thames Crossing; and
- Maximising the economic, housing and accessibility benefits of the Lower Thames Crossing.

### QUESTION 3

**Are these key issues the right ones or are there any key issues that you think have been missed?**

#### **What do we want Thurrock to be like in 2038?**

An important part of the Local Plan is its vision. This needs to set out our ambitions for Thurrock as a place and provide a clear picture of what we want the Borough to be like in 2038 and the role it plays as part of the wider 2050 vision for the development of South Essex.

Thurrock Council and its partners have an ambitious agenda to transform the Borough. Much has been achieved in recent years through the concerted efforts of our partners to increase prosperity and enhance the lives of those who live and work in the Borough but the agenda remains unfinished.

Preparing a new Local Plan has given us the chance to look afresh at what sort of place we want Thurrock to be in the future and to address the key issues and challenges set out in the preceding section.

A new vision for Thurrock needs to be developed which takes account of:

- Thurrock's strategic location in close proximity to London, the M25 and as a Gateway to the World;
- The success of the Council and partners in laying the foundations for the development and implementation of an ambitious growth agenda for Thurrock;
- The scale and nature of the further opportunities for driving forward economic growth and the need to ensure that the benefits of increasing prosperity are shared by all sections of the community;
- The challenges of delivering a step change in the quality of Thurrock as a place and the need to change people's perceptions of Thurrock as somewhere to live and work;
- The opportunity to harness the future scale and distribution of housing and employment growth to act as a powerful catalyst for transformational change and community regeneration;
- The need to address existing infrastructure deficits and support future growth;
- The need to plan for the economic, environmental, transport and social impacts of a possible Lower Thames Crossing;
- The long term priorities and strategies of the Council and its partners;
- Cross boundary issues such as the scale and distribution of housing, employment, transport and strategic infrastructure provision across South Essex;
- Changes to national policy, guidance and legislation since the adoption of the Core Strategy; and
- New challenges including a changing economic climate which have emerged since the adoption of the current Local Plan.

The starting point in developing the Local Plan vision is the Council's corporate vision which is for Thurrock to be 'an ambitious and collaborative community which is proud of its heritage and excited by its diverse opportunities and future.'

**Figure 8: Corporate Vision**



The draft vision for the Local Plan reflects, and elaborates upon the Council's corporate strategy and will support its delivery.

### **Local Plan Vision**

*"By 2038 Thurrock will have grown into a more prosperous, attractive and sustainable place to live and work, with improved quality of life and thriving communities. Galvanised by a generation of planned investment in the Borough's transport infrastructure and enhanced by continually improving educational attainment, the Borough will have secured its position as the economic powerhouse of South Essex with a flourishing economy driven by port related industries, the logistics sector, new technologies and innovation, recognised for and characterised by a highly skilled, inclusive working population."*

*The delivery of high quality, desirable housing, tuned to local need and demand, has greatly stimulated what is now a buoyant housing market. More sustainable patterns of living will have been achieved throughout the Borough as a result of the successful development and expansion of its economic hubs, the successful creation of new mixed use developments, sustained environmental enhancements and key improvements to public transport network."*

*The inherent quality of Thurrock's natural and built environments including the riverfront areas will have continued to be celebrated and enhanced, creating places that people can be proud of, that build on the Borough's distinctive and unique character through bold, imaginative and inclusive design".*

#### QUESTION 4

**Have we got the Local Plan vision right? Are there any changes you would like us to consider?**

#### How do we get there?

To address the key issues and take forward the vision, a number of strategic objectives have been identified through the Issues and Options (Stage 1) consultation and the various evidence base work that has been undertaken. These are set out in **Figure 8** and will be used to guide future policy development.

#### Figure 8: Draft Strategic Objectives

- Improve accessibility to employment, local services and facilities;
- Reduce congestion;
- Support integrated and well-connected public transport;
- Support the Borough's economic success;
- Reduce the Borough's carbon footprint;
- Provide an appropriate mix of high quality and affordable housing to meet the needs of all sections of the community;
- Ensure the delivery of an appropriate range of high quality community infrastructure and services;
- Deliver regeneration and reduce inequality and social deprivation;
- Provide a range and choice of employment opportunities;
- Promote, conserve and enhance the special character and heritage of Thurrock;
- Provide, improve and maintain a well- designed network of green places and open spaces;
- Identify and deliver sufficient suitable development sites to meet Thurrock's future housing, employment and other needs;
- Improve the health and well-being of the Borough's residents;
- Retain an effective Green Belt;
- Maintain and enhance the Borough's network of retail centres as a focus for shopping, leisure, business, housing and community activity;
- Protect and enhance the Borough's tranquil areas;
- Reduce waste and meet future needs;
- Conserve and enhance the Borough's built and natural environmental assets;
- Value and protect the role played by the River Thames as an economic and environmental asset; and
- Ensure new development is well designed and future-proofed to meet changing economic, social, technological and environmental needs.

## **QUESTION 5**

**Are the objectives the right ones? Are there any objectives that you think we have missed?**

### **Policy Principles - How should development take place?**

The key issues that the Borough is facing, the objectives to be pursued, and the choices for the broad approach to new development have been set out. The Local Plan will also need policies to make sure that new development contributes to the delivery of the objectives and Government policy requirements.

Policies dealing with the following principles which are common to each Option will be developed as part of the Local Plan Preferred Option.

#### **a) Ensure the provision of the required supporting infrastructure**

The delivery of new infrastructure is crucial to the development of Thurrock as an economically prosperous, attractive and healthy Borough. To achieve this, the plan-making process will need to be underpinned by the preparation of a comprehensive Infrastructure Delivery Plan (IDP) which identifies the future transport and community infrastructure needed to support growth, together with the funding and implementation mechanisms needed to secure their delivery. Where large scale development is proposed, Master Plans and Delivery Frameworks will set out in more detail what infrastructure improvements are needed together with the phasing of their delivery. In preparing the IDP the Council will work closely with Government, infrastructure providers, the development industry and local communities to align investment priorities and strategies to deliver the right infrastructure, in the right place, and at the right time.

#### **b) Meeting Housing Needs**

Development should provide for the diverse housing needs of people, both living in and moving to the Borough, including affordable housing to meet local needs. Policies will identify the scale and distribution of new housing development together with the necessary supporting community and other infrastructure. The criteria for the location of Gypsy and Traveller sites will also be set out in the Local Plan and it will be necessary to identify strategic housing sites and Gypsy and Traveller sites. Where appropriate, Inset Plans and Master Plans will set out a more detailed planning, design and infrastructure framework to guide the future development of strategic housing developments.

#### **c) Regenerating existing Local Communities and Centres**

A key guiding principle underpinning the preparation of the new Local Plan is that, wherever possible, new development should be located alongside, or in close proximity to, existing communities where there is a clear need or opportunity to harness future investment in new homes to help fund the regeneration of existing centres and secure, where needed, the delivery of new shops, services, schools, health and community facilities to meet both current and future community needs. Where appropriate, Inset Plans and Master Plans will set out a more detailed planning, design and infrastructure framework to guide the future development of these regeneration areas.

#### **d) Maintaining an effective Green Belt**

In order to meet Government policy objectives, the Council will have to consider releasing land from the Green Belt to accommodate the number of homes and supporting community facilities required to

meet Thurrock's development needs over the period to 2037/38. Policies will need to ensure that the green belt continues to be effective in protecting the character of the Borough and maintaining key gaps between urban areas and settlements.

#### **e) Meeting Employment Needs**

Policies will need to recognise the aspirations of major businesses in the Borough to develop and expand, whilst also ensuring that development occurs in the right locations to protect and enhance the attractiveness of the Borough and to make the best use of both existing and planned investment in new infrastructure, including digital technology.

Policies will also need to ensure that there is sufficient housing available to accommodate the needs of workers and that appropriate arrangements are put in place to ensure the availability of an educated and skilled labour force to, both meet the needs of employers, and ensure that the benefits of ongoing job creation are accessible to all sections of the community.

#### **f) Ensuring that our Town Centres continue to thrive**

Policies should enhance the accessibility, quality and vitality of the Borough's network of centres as a focus for shopping, leisure, business and community activity. This includes the transformation of Lakeside into a regional town centre, the regeneration of the Borough's traditional centres and the development of new centres in areas of proposed housing growth to create balanced and sustainable new communities.

A review of boundaries of the town centres and primary retail frontages will be undertaken and policies developed which will set out guidance on the proposed scale and distribution of new retail, commercial, housing and leisure related development. Where appropriate, Inset Plans and Master Plans will set out a more detailed planning, design and infrastructure framework to guide the future development of individual centres.

#### **g) The River Thames**

Thurrock's character and history is interwoven with that of the River Thames. In economic terms, the Port of Tilbury and the new deep water container port at London Gateway are of national significance and crucial to the economy of the Borough, London and the wider South East. The river is also important as a natural habitat which forms part of a wider and unique riverscape which hosts important heritage assets including Coal House Fort and Tilbury Fort which help contribute to defining Thurrock's identity and sense of place.

It will remain an important principle that the Local Plan should continue to recognise and exploit the economic opportunities arising from Thurrock's location by the river, whilst also respecting the need to protect and enhance the distinctive riverscape and natural habitats. Going forward, priorities around the development of the river and its foreshore will vary from place to place, as individual areas will lend themselves to different opportunities, whether this is maximising the potential of the ports, promoting new high quality residential developments or opening up the riverfront for recreational purposes. The Local Plan will need to draw a careful balance between exploiting the presence of the river as a catalyst for growth with the need to protecting the environment and unique riverside biodiversity and ecology.

#### **h) Protecting and Delivering Quality in the Built Environment**

All new development will be required to meet high standards and improve the overall quality of Thurrock as a place to live and work. The Council has recently adopted the Thurrock Design Strategy

and, embedded within the Local Plan, will be a continued policy commitment to good design to aid the transformation of Thurrock.

### **i) Managing Waste**

Provision will need to be made for waste management facilities by identifying sites and/or a policy enabling the use of appropriate land to ensure that targets are met and that waste can be managed locally. Mineral resources in the Borough will be protected, and sites, preferred areas and/or areas of search identified for the extraction of sand and gravel, and other mineral infrastructure, in line with identified future needs. A separate Minerals and Waste Local Plan will be prepared to address these issues.

### **j) Minimising Carbon Emissions**

Policies will seek to minimise carbon dioxide emissions from new development, contribute to longer term targets to reduce emissions and ensure that developments are protected from the impacts of climate change. Development should minimise the need to travel, and encourage accessible neighbourhoods using public transport, cycling and walking as a real alternative to car use.

## **QUESTION 6**

**Do you agree that these are the right policy principles? Are there any policy principles that you think have been missed?**

## **Lower Thames Crossing**

The Lower Thames Crossing (LTC) is a proposed new road crossing of the River Thames east of London that will connect Kent and Essex. Following consultation on a series of route options, the Secretary of State for Transport announced in April 2017 that the Preferred Route would connect the A2 in Kent, east of Gravesend, to the M25 in Essex, south of Junction 29, crossing under the River Thames by means of two bored tunnels. Between the A2 and A13 Junctions, the route is currently proposed as a dual two-lane carriageway; north of the A13 the route would be a dual carriageway. The improvements would include widening of the M2/A2 and the M25 at each end of the route. The total length of the route, including junction widening, would be approximately 31km, with approximately 3.5km in tunnel.

On the north side of the river, the route would run to the west of East Tilbury and between Chadwell St Mary and Linford. The route would cross the A13 to the West of Orsett at the location of the existing A13/A1089 junction. To the north of the A13 the route would pass to the west of Orsett and then turn to the west passing north of South Ockendon before connecting with the M25 between Junctions 29 and 30 via a new junction with north facing slip roads.

Junctions are being considered at the following locations:

- A new junction with north-facing slip roads on the M25 between Junctions 29 and 30;
- A modified junction with the A13/A1089;
- A new junction east of Tilbury;
- A new link road is provided from the new junction east of Tilbury to the west which would connect with Tilbury; and

- A new junction with the A2 to the east of Gravesend.

An indicative plan of the proposed alignment of the Lower Thames Crossing is shown on Figure x below.

The Lower Thames Crossing is expected to open by 2027, subject to the necessary funding and planning approvals.

Notwithstanding the differing viewpoints on the merits or otherwise of the Government's proposals for a new Thames Crossing in Thurrock, the preparation of the Local Plan must take into account the significant economic, environmental and transport implications of any decision by the Government to move forward with the scheme. In this regard, the Local Plan must reflect and respond to the following land use and planning considerations by providing an effective planning policy framework which:

- Safeguards the alignment of the route including the location of junctions;
- Addresses the economic impacts of the proposal including the need to protect existing businesses and promote future economic growth;
- Helps mitigate the short, medium and longer term environmental impacts of the proposed crossing on existing communities, settlements and the Borough's historic assets and environmental infrastructure;
- Supports and does not constrain the ability of the Borough to meet its future development needs, including an increase in housing delivery;
- Addresses the need to ensure the beneficial restoration or reuse of land used in the construction of the project;
- Protects and enhances local access routes and reduces the negative impact of severance on local communities;
- Protects and improves transport connectivity both to, through, and within Thurrock for local businesses and residents; and
- Ensures that the cumulative environmental impacts (air quality, cultural heritage, landscape, biodiversity, geology and soils materials, noise and vibration, people and communities, rain drainage and water environment) of proposed Local Plan allocations and the LTC are properly assessed and mitigated where necessary.

Given the complex interrelationship that exists between the two processes, it should be noted that it will not be possible for the Council to submit the Local Plan for Examination until such time as a final decision has been made on the route and location of the Lower Thames Crossing.

## SECTION 4: WHAT LEVEL OF GROWTH IS NEEDED - HOUSING

### Context

One of the main purposes of a Local Plan is to set out how much housing is needed, including specific types of housing and where these homes should be located. Previously, housing targets for local authorities were set out in regional plans. However, following the abolition of the regional planning system, it is now the responsibility of each local authority to set its own housing targets but these targets must be based on sound evidence and discussed with other authorities under the Duty to Cooperate process.

Following the decision by the South Essex authorities to strengthen the arrangements for strategic planning across the area, the process of formally agreeing the future scale of new housing development for Thurrock will now be made through the process of preparing and adopting a Joint Strategic Plan (JSP).

In preparing the JSP, it will remain important that any strategic decisions regarding the scale and nature of future housing needs are fully reflective of the capacity of the individual local authority areas to support the levels of growth proposed, and that the scale and nature of the future housing provision being planned for meets local needs and supports wider economic, community and social policy objectives. In order to achieve this, it remains crucial that the evidence base being developed in support of the local planning process and the views of the community are used to inform the preparation of the Joint Strategic Plan. This will help ensure that the policy approach set out in the JSP is realistic, deliverable and fully reflective of local needs and the opportunity to create attractive places to live, work and enjoy.

### Understanding how many homes we need

Thurrock is part of the South Essex Housing Market Area and as such the Council needs to work with the other authorities in South Essex to assess how much housing and what types of housing are needed across the sub-region. In May 2017, the South Essex Authorities published an update to the South Essex Strategic Housing Market Assessment (SHMA) which used 2014 based population and household projections, together with bespoke economic growth projections, to identify the need for 4,000 new homes across South Essex, per year, from 2014 to 2037. The SHMA also identified the housing need figure for each individual local authority within the housing market area.

Thurrock's housing need figure in the 2017 SHMA update was assessed as being between 1,074-1,381 homes per year, which is the equivalent of 25,776 – 33,144 over the plan period. However, the lower figure does not reflect the projected rate of economic growth in the Borough and therefore the higher figure is generally viewed to be a more realistic reflection of future housing needs in Thurrock. **Figure 9** sets out a basic summary of how the housing need figure has been worked out.

**Figure 9** – Breakdown of Thurrock's objectively assessed housing need figure

Stage	Adjustment	Number of dwellings per annum
Starting point: 2014 population and household projections (Source: Office for National Statistics (ONS))		869

Demographic adjustment – for hidden needs such as older children still living at home. These people are not homeless or in urgent housing need but would like to rent or buy a home of their own.	+107	976
Market signals adjustment – house prices are much higher than local people can afford. Increasing supply should help lower prices and make it easier for people to rent or buy a home of their own.	+98	1,074
Economic growth adjustment	+307	1,381

#### INFORMATION

The 2016 Strategic Housing Market Update and the 2017 Addendum to the South Essex Strategic Housing Market Assessment are available to view on the Council's website [www.thurrock.gov.uk/localplan](http://www.thurrock.gov.uk/localplan).

National planning policy states that local authorities should ensure that Local Plans aim to meet their areas' objectively assessed need for market and affordable housing in full. As such, the starting point for preparing the new Local Plan is that the Council should aim to allocate enough land to provide for 1,381 dwellings per year over the plan period to support future economic growth, and to boost the supply, range, quality and affordability of housing to meet the needs of local communities. Setting a housing target lower than the objectively assessed need figure would require the Council to approach neighbouring authorities through the Duty to Co-operate process and through the preparation of the JSP to see if they are able to accommodate all or part of the unmet housing need. Initial discussions with neighbouring authorities indicate that, at present, this is unlikely to be the case.

#### QUESTION 7

**Do you agree that the Council should seek to allocate enough land to meet its objectively assessed housing need of 33,144 new homes over the plan period? Please explain your answer and reference supporting evidence where possible.**

#### INFORMATION

##### Standardised Approach to Assessing Housing Requirements

On 20th September 2017, the Government published a new standardised methodology for assessing future housing needs for consultation. The Government believes that the adoption of a new standardised methodology will provide a more transparent and more consistent basis for Local Plan production. An assessment of housing need calculated using the standard methodology (based on 2014 based household projections and the 2017 affordability ratio) identifies a need for 1,173 homes per year in Thurrock. However, the standard methodology fails to consider whether any adjustments

need to be made to the housing need figure to ensure that the provision of new housing addresses any imbalance between the available labour supply and the projected rate of job growth in the Borough. Therefore, if a decision is made by Government to enforce the use of a standardised approach when assessing housing need, it may be appropriate for the Council to carry out additional work to assess whether any further uplift is required to the housing figure to support the economic growth agenda for the Borough.

## **Planning for affordable housing**

Affordable housing is social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Thurrock has a significant need for more affordable housing. This need was calculated in the 2016 South Essex Strategic Housing Market Assessment (SHMA) and was updated in May 2017 in response to new demographic projections. The net annual affordable housing need for the next five years is 472 dwellings per year rising to 663 per year for the remainder of the plan period. If the identified annual requirement for affordable housing was applied to the overall annual housing need, it would mean that 48% of the total number of new dwellings built would need to be affordable.

In considering what percentage of all new residential development should be affordable, the Council has to consider a number of things including land supply, viability and the availability of alternative delivery models.

National policy states that pursuing sustainable development requires careful attention to viability and costs in both plan-making and decision-taking. Local Plans must be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that the ability for them to be developed viably is threatened. The Local Plan Viability Baseline Report tests the current affordable housing target of 35% against several generic housing typologies and concludes that this level of affordable housing is generally only viable when looking at greenfield sites. This finding is consistent with delivery patterns over the last few years as the majority of sites in the urban area are supported by viability statements indicating that the required amount of affordable housing cannot be met on site without impacting the viability of the overall development.

The Local Plan Viability Study Baseline Report also tests the level of developer contributions that could be achieved against different affordable housing targets. The report concludes that lower affordable housing targets might be appropriate in some areas where there is a particularly high requirement for developer contributions towards infrastructure and other forms of mitigation.

### **INFORMATION**

The 2017 Local Plan Viability Study Baseline Report is available to view on the Council's website [www.thurrock.gov.uk/localplan](http://www.thurrock.gov.uk/localplan). It is worth noting that this study explores the general viability of a set number of housing typologies that reflect the type of developments that could come forward in the Borough in the future. It does not look at the viability of specific sites. This study will be updated prior to submission of the Local Plan to the Secretary of State and we welcome comments on its content.

## **QUESTION 8**

a) To help maximise the amount of affordable housing delivered over the plan period, which

approach should the Council look to adopt? Please reference supporting evidence where possible.

#### **Approach A – 35% Borough Affordable Housing Target**

Set a borough wide affordable housing target of 35% that is reflective of the level of affordable housing that could be achieved on greenfield sites in the borough and continue to assess site viability on a case by case basis.

#### **Approach B – 15% Borough Affordable Housing Target**

Set a borough wide affordable housing target of 15% that is more reflective of the minimum affordable housing ask that could be achieved on the majority of sites in the borough and seek to achieve higher developer contributions towards key infrastructure improvements.

#### **Approach C – Split Affordable Housing Target**

Set a split level affordable housing target that sets a lower target of 15% for previously developed land to incentivise development in these areas and higher target of 35% on greenfield sites.

#### **b) Are there other options that should be considered?**

### **Meeting the needs of specific groups**

When planning for how the Borough may change, it is important to consider the needs of specific groups and plan for a mix of homes and a range of sizes and types to meet both current and future housing needs.

National policy encourages Local Plans to plan positively for a mix of housing based on an assessment of the type of people that live in the Borough both now and in the future. This includes providing a mix of homes to meet the needs of different groups such as families with children, older people, those with disabilities or particular support needs and those wishing to build their own homes.

As Thurrock is a part of the South Essex Housing Market Area, these needs have been considered on a sub-regional basis through the 2016 South Essex Strategic Housing Market Assessment. This assessment notes that the housing needs of older people in particular need to be carefully planned for.

### **Housing Mix and Size**

National policy highlights the importance of considering the size and type of housing required once an overall housing figure has been identified. The 2016 South Essex Strategic Housing Market Assessment assesses the need for particular types of dwellings by looking at an area's existing housing stock and comparing that with anticipated housing needs based on population projections and an area's Housing Needs Survey. **Figure 10** sets out the types of housing required in Thurrock over the plan period.

**Figure 10 – Suggested Housing Mix**

Overall Housing Need		1,381 (per annum)	31,763 (total)
Detached			
3 bed or less	7%	97	2,231
4 bed	4%	55	1,265
5 bed or more	1%	14	322
Semi-detached			
2 bed or less	9%	124	2,852
3 bed	23%	318	7,314
4 bed or more	4%	55	1,265
Terraced			
2 bed or less	9%	124	2,852
3 bed or more	22%	304	6,992
Flat			
1 bed	11%	152	3,496
2 bed or more	10%	138	3,174

In October 2015, the government introduced a new housing standard called the Nationally Described Space Standard. This new standard is designed to improve the quality of new-build housing by ensuring they are built to an adequate size. This standard can only be applied locally if it is adopted through the Local Plan and the need for such a policy is appropriately evidenced. The Council is currently undertaking a review of recent planning applications to look at average dwelling sizes and how these compare with the Nationally Described Space Standard.

#### **QUESTION 9**

**In planning for a suitable mix of housing which approach/es should the Council look to**

**adopt? Please reference supporting evidence where possible.**

**Approach A – No Specific Housing Mix Target**

**Requires all applicants for residential development schemes to demonstrate that they have considered the findings of the Strategic Housing Market Assessment when planning their development.**

**Approach B – Borough Wide Housing Mix Target**

**Set a borough wide housing mix target that would apply to all new residential developments.**

**Approach C – Site Specific Housing Mix Targets**

**Incorporate site specific housing mix targets in site allocation policies.**

**QUESTION 10**

**Should the Council seek to adopt the Nationally Described Space Standard in the emerging Local Plan?**

**Housing for older people and people with specialist needs**

National policy requires local authorities to meet the specific accommodation needs of older people and people with specialist housing needs. Offering attractive alternative housing choices for older people and vulnerable groups will assist in freeing-up family sized homes that are currently under-occupied.

There is, therefore, a need to provide suitable accommodation for various groups of people, including the elderly, people with disabilities and vulnerable people. This covers a range of housing types, from accessible and adaptable general needs housing to the full range of retirement and specialised housing for those with support or care needs.

The Government's reform of Health and Adult Social Care is underpinned by a principle of sustaining people at home as long as possible. Therefore, accommodation for older people is moving towards more flexible forms of living and support, which seek to maintain people's independence; for example, a self-contained home within a site offering extra facilities. People who are unable to live independently require specialist residential or nursing care accommodation. This type of accommodation usually falls within the C2 Use Class.

Like many areas around the country, Thurrock has an ageing population and an increase in all types of accommodation options for older people and vulnerable groups will be needed over the plan period to meet their housing needs.

**QUESTION 11**

To help better plan for the needs of older people and those with specialist needs which approach/es should the Council look to adopt? Please explain your answer, referencing supporting evidence where possible.

**Approach A: All Dwellings Built to M4 (2) Requirement**

Ensure that all new homes meet Building Regulation requirement M4 (2) 'accessible and adaptable dwellings'.

**Approach B: Built to M4 (3) Requirement on Large Residential Developments**

Ensure that at least 10% of all new homes on large scale residential developments meet Building Regulation requirement M4 (3) 'wheelchair adaptable dwellings'.

**Approach C: Allocate Specific Older Person Housing Sites**

Allocate specific sites for older persons housing including dementia friendly developments.

**Approach D: Allocate Specific Residential Care Sites**

Allocate specific sites for residential care facilities.

**Custom build housing**

Self-build housing, also known as Custom Build, typically involves individuals and/or associations commissioning the construction of a new house from a builder, contractor, package company or physically building a house for themselves. Sometimes developers offer the option of a serviced plot where individuals can design and build their own home as part of a larger scheme. The Council keep a register of individuals and community groups who would like land for self-build and custom house building. The register is used as part of our evidence of demand for this type of housing, which we use for local planning. There are currently 33 individuals on this register. Whilst it is appreciated that this represents a relatively small proportion of the Borough's housing need, the need to allocate appropriate sites is still something that should be considered as part of the Local Plan process.

**QUESTION 12**

Should the Council seek to allocate specific sites for custom build housing? Please explain your answer, suggesting specific sites if appropriate.

**Ensuring that the needs of Gypsies, Travellers and Travelling Showpeople are met**

Local Planning authorities must assess the need for Gypsy, Traveller and Travelling Showpeople accommodation in their areas and, if a need is identified, look for sites to provide for that need. The Council does not currently have an up to date assessment of need for Gypsies and Travellers as the 2014 Essex Gypsies and Travellers Accommodation Assessment is in the process of being reviewed to ensure that it is in full conformity with national policy. The Council intends to hold a more focussed consultation on how we meet our needs for Gypsies, Travellers and Travelling Showpeople once this review is complete. In the interim the Council is still keen to hear about sites that may be suitable for use by Gypsies, Travellers and Travelling Showpeople as permanent or transit sites. If you are aware of any sites we would welcome you to submit them as part of our 2018 Call for Sites.

## INFORMATION

National policy sets out specific criteria guiding the location and design of Gypsy and Traveller sites, recognising their particular characteristics. These criteria recognise that sites may be located in rural areas, but that new traveller site development in the open countryside that is away from existing settlements should be very strictly limited.

## LOCATION OF HOUSING GROWTH – SPATIAL OPTIONS

### HOUSING LAND SUPPLY

The National Planning Policy Framework (NPPF) requires local planning authorities to prepare Strategic Housing Land Availability Assessments to establish realistic assumptions about the availability, suitability, and the likely economic viability of developing land. It forms a key component of the Local Plan evidence base and assists plan-makers in choosing sites to go forward into the Local Plan to meet objectively assessed needs. It also allows local planning authorities to understand what the land supply is, and therefore, whether there are sufficient sites available to meet future housing needs.

In September 2016, the Council commissioned the preparation of an up-to-date Housing Land Availability Assessment that:

- Identifies sites/broad locations;
- Assesses the development potential of sites;
- Assesses the suitability, availability and achievability of sites.

The Planning Practice Guidance (PPG) requires that a wide range of sites and broad locations should be identified, and that sites should include information on constraints to show their potential for development. The guidance also requires local planning authorities to issue a call for potential sites. This was undertaken by the Council in 2015, 2016 and 2018, and involved a wide range of groups, organisations, landowners, agents and developers. A total of 438 sites were identified for assessment, which included analysis of physical and policy constraints, together with a separate assessment of their development potential and economic viability.

The NPPF refers to sites being deliverable, developable or not currently developable. Sites that are deliverable are those that can come forward in the first 5 years of the plan period, and sites that are developable can come forward in years 6-10 and, where possible, years 11-15. Year 1 is the monitoring year April 2016 to March 2017. Therefore, sites under construction that had completions before this year were not included in the trajectory.

**Figure 11 Indicative Trajectory (Base date 1<sup>st</sup> April 2017)**

Typology (Dwellings)	Years 1-5	Years 6-10	Years 11-15	Total
Planning Permission: under construction	1,314			1,314
Planning permission: unimplemented	1,210	521		1,731
Sites without planning		2,072	1,250	3,322

permission				
Windfalls	111			111
Total	2,635	2,593	1,250	6,478

Source: Draft Interim Housing Land Availability Assessment

The first five years of the trajectory comprises planning application sites that are under construction and unimplemented planning permissions. The windfall allowance is included in years 1-5 as well, which is 111 dwellings (37 dwellings x3 years, to avoid double counting with sites that would likely have planning permission in the first two years of the trajectory).

In years 6-10, the majority of the development coming forward is from the Purfleet Centre, which is proposed for 2,500 dwellings and split between years 6-10 and 11-15. Also, there are some sites with planning permission that are unimplemented which, for example, are expecting revised applications. In years 11-15, aside from the final phases of the Purfleet Centre, there are no other developable sites available to contribute to the indicative trajectory.

## INFORMATION

A copy of the Interim Housing Land Availability Assessment Report will be available to view at the Council's Local Plan website. ([www.thurrock.gov.uk/localplan](http://www.thurrock.gov.uk/localplan))

## Meeting Objectively Assessed Needs

Thurrock's OAN (taken from the Addendum to the South Essex Strategic Housing Market Assessment, 2017), is 1,381 dwellings per annum. Over the plan period (2014-2037) this translates into a need for 31,763 homes. The capacity of the deliverable and developable land identified in the Draft Interim Housing Land Availability Assessment of 6,478 dwellings over 15 years is insufficient, and falls significantly short of meeting the Borough's OAN. The guidance states that where there are insufficient sites, the assessment should be revisited to review the tests and constraints blocking sites; if this does not result in enough sites, the guidance states that it may be necessary to consider how housing needs can otherwise be met.

In order for the Local Plan to identify sufficient land to meet Thurrock's OAN, the plan-making process will need to consider whether it is possible to provide additional development capacity through the redevelopment of land in the ownership of the Council and through a change in planning policy which currently protects allocated employment sites and Green Belt land from housing development.

## Land in Council ownership

It is important to note that the HLAA is intended to be a 'living document' and will be updated on an annual basis. The current version of the HLAA, therefore, only provides a snap shot of what land is currently available for housing development at the date of survey. The Council is currently undertaking a review of land in its ownership to identify additional sites for redevelopment for housing. It is anticipated that the outcome of the review will feed into the next version of the HLAA due to be published in summer 2018. At this stage it is not possible to forecast with any accuracy what additional capacity will be derived from this source. However, given the nature of the Council's land portfolio and the suitability of these sites for housing, it is unlikely that the pool of available sites will lead to a significant increase in the Borough's overall housing land supply position.

## **Employment Sites**

The Core Strategy includes several designations that protect employment land, with the main employment designation being Primary and Secondary Industrial and Commercial Areas, which protects sites for B1, B2, B8 and sui generis users. Both the Housing Land Availability Assessment and the Employment Land Availability Assessment studies generally concluded that the designated and non-designated employment sites in the Borough were occupied and in employment use and should therefore continue to be protected. A small number of employment sites in residential areas were also identified as having the potential for housing development, subject to suitable and viable alternative sites being found to accommodate the relocation of any affected businesses. However, given the scale and nature of these sites, their reallocation for residential use will only marginally increase the supply of housing land in the Borough and then only in the later stages of the plan period. This reflects the practical difficulties in assembling and remediating these sites for development.

## **Green Belt**

Two thirds of Thurrock is designated as Green Belt. Development in the Green Belt is subject to Core Strategy Policy PMD6 (Development in the Green Belt) and national policy in the NPPF, which protects the Green Belt and recommends that boundaries should only be changed in exceptional circumstances, through the preparation or review of the Local Plan. Around half of the sites considered by the HLAA were in the Green Belt and, therefore, were considered to be constrained by planning policy and not available for development at this stage of the plan-making process. This means that if Thurrock is to meet its OAN in full, the Local Plan will need to consider the release of Green Belt land in order to meet the scale of development required.

## **Thurrock Green Belt Assessment**

With the exception of the principal urban area of Thurrock, and the towns and villages, all of the land within the Borough is designated as Green Belt. Green Belt is a strategic planning policy designation concerned with the relationships between built and unbuilt areas and between settlements. Figure 11 identifies the land that is within the Green Belt within both Thurrock and adjoining local authority areas.

## **Figure 11: Map of Green Belt**

**[Insert Map]**

The National Planning Policy Framework (NPPF) states, in paragraph 79, that ‘the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and permanence.’ The NPPF sets out 5 purposes of the Green Belt:

- To check the unrestricted sprawl of large built-up areas (first purpose);
- To prevent neighbouring towns from merging into one another (second purpose);
- To assist in safeguarding the countryside from encroachment (third purpose);
- 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.

National policy requires that once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and bio-diversity; or to improve damaged and derelict land.

The NPPF notes that the general extent of Green Belts across the country is already established and that new 'Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions.'

Paragraph 82 of the NPPF states that if local planning authorities are proposing a new Green Belt, they should:

- Demonstrate why normal planning and development management policies would not be adequate;
- Set out whether any major change in circumstances have made the adoption of this exceptional measure necessary;
- Show what the consequences of the proposal would be for sustainable development;
- Show how the Green Belt would meet other objectives of the Framework.

Policy requires that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, 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.

When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channeling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.

The Council considers that given the acute shortage of land currently identified as being available to meet Thurrock's full objectively assessed housing need over the plan period, that the exceptional circumstances required by the NPPF to justify changes to Green Belt boundaries can be clearly demonstrated.

The need for the Borough to consider amending the boundaries of the Green Belt in Thurrock is not new. In her Report on the adopted Core Strategy (December 2011) the Planning Inspector examining the plan identified the need for the Council to review the Borough's Green Belt boundaries in order to identify sufficient land to meet the then Core Strategy housing target of 23,500. Since the adoption of the Core Strategy in December 2011, not only has Thurrock's future housing needs requirement increased to 31,463 homes over the Plan period, there has also been a corresponding reduction in the availability of land in the urban area as potential housing sites have been built out for housing or other uses, thereby worsening the housing land supply problem and increasing the need for the Council to consider amending the Borough's Green Belt boundaries to accommodate future development needs.

In order to inform this process the Council has commissioned the preparation of a Green Belt Assessment to assess the whole area of Green Belt within the Borough. This study has been carried out in a number of stages:

- Identification of the study area;
- Identification of key constraints (i.e. those 'high level' constraints that are likely to prevent or severely limit the potential for development to occur);
- Identification of land parcels for assessment;
- Assessment of the parcels against the purposes for including land in the Green Belt; and
- Identification of the relative potential importance of the contribution of parcels to the Green Belt in the context of their suitability to accommodate a strategic level of development.

It should be noted that the Green Belt Assessment is a technical document and does not specifically identify any sites or broad areas of Green Belt for development as any decision on the need to amend the boundary of the Green Belt in Thurrock must be taken as part of the wider plan-making and evidence development process.

## **INFORMATION**

A copy of the Stage 1 Green Belt Assessment Report is available to view at the Council's Local Plan. ([www.thurrock.gov.uk/localplan](http://www.thurrock.gov.uk/localplan)).

## **HOUSING GROWTH OPTIONS**

As the Borough grows there will be a need to plan for new homes, the economy and associated infrastructure. What is clear is that there are insufficient brownfield sites in the urban area to accommodate the likely level of growth required so new locations for development will need to be found.

There are options as to how this growth can be accommodated across the settlements in the Borough although all either individually or collectively must accommodate the overall scale of development required to match future needs and ensure that housing delivery can be sustained over the plan period.

### **Potential development opportunities and constraints**

Options for the distribution of housing development within the Borough have been identified based on the evidence produced to support the preparation of the Local Plan. A number of strategic growth options are put forward for consideration which reflect the opportunities to:

- Deliver sustainable development;
- Re-use previously developed land;
- Increase levels of housing delivery;
- Offer housing choice and development opportunity;
- Maximise employment opportunity and accessibility;
- Make use of existing settlement size and access to services and community infrastructure;
- Maintain settlement identity and local distinctiveness; and
- Maintain the strategic integrity of the Green Belt.

In identifying potential locations for new development, it is important to recognise that much of the Borough is unable to accommodate development due to the presence of numerous planning policy, physical and environmental constraints.

In or adjoining much of the Thurrock urban area, development capacity is constrained by policies which preserve the area's historic assets and open green spaces, and also legislation designed to prevent development in unsafe locations, whether from proximity to hazards like stored explosive materials, over or underground utility cables or fuel pipelines, or land at risk of flooding. **Figure 12** below shows the key constraints affecting the development capacity of land within the Thurrock urban area.

**Figure 12: Thurrock Urban Area Development Constraints**

**[Insert Map]**

Outside of the urban area the remainder of the Borough is covered by Metropolitan Green Belt. Within the Green Belt extensive areas of land on the urban fringe and beyond are constrained from development for a wide range of reasons, including the following:

- **Flood Risk** – all areas at risk of coastal or fluvial flooding as identified by the Environment Agency;
- **Environmental Policy Designations** – Sites of Special Scientific Interest (SSSI), Ancient Woodland, RAMSAR sites, as defined by Natural England and Local Wildlife Sites that are all important for biodiversity;
- **Community Assets** – Country Parks and other local assets adjoining urban areas;
- **Heritage Designations** – Scheduled Ancient Monuments, Registered Parks and Gardens and Conservation Areas as defined by Historic England;
- **Topography** – Ridge and Slope features including land over 100m above sea level/local landmarks;
- **Minerals and Waste and landfill areas** –safeguarded sites and former/current landfill sites; and
- **Energy Transmission Infrastructure** – Overhead Powerlines /Underground Pipelines.

**Figure 13** below shows the key constraints affecting the development capacity of land within the Metropolitan Green Belt.

**Figure 13:** Green Belt Development Constraints

**[Insert Map]**

## **Lower Thames Crossing**

The proposed Lower Thames Crossing will represent a significant constraint on development. **Figure 14** shows the current alignment of the proposed route superimposed onto a map showing the sites contained within the Interim Thurrock Housing Land Availability Assessment. Based on the current alignment and scheme configuration, the Lower Thames Crossing could have an adverse impact on the potential to bring forward sites for housing development along the length of its route for a range of reasons including the impact of noise, air-quality, severance, and flood risk considerations. The areas most affected include: land west of East Tilbury; land north of Chadwell St Mary; land in and around the vicinity of the proposed junction with the A13; and land north and east of South Ockendon.

The full extent of these impacts on the availability of land for development will need to be assessed in more detail through the plan-making process and the ongoing detailed design work and environmental impact assessment work associated with the Lower Thames Crossing. The outcome of this work will help inform decisions on whether the identification of broad locations for growth or specific sites for development can be taken forward as development plan allocations.

**Figure 14:Lower Thames Crossing – Development Constraints**

**[Insert Map]**

## Spatial choices

The Council recognises that the choices to be made are not easy and will require careful consideration. Each of the options for future housing growth has different implications for individual settlements and consequential impacts on local infrastructure, market choice and, importantly, delivery.

At this stage the Council cannot specify what the precise implications may be arising out of each option, but it is keen to hear views from the local community and interested stakeholders on what broad options ought to be considered along with their potential impacts, appropriateness and deliverability.

The specific options presented in this document represent the first stage of consultation, working towards formal identification of broad strategic development locations within the South Essex Joint Strategic Plan and as site specific allocations at the Draft Local Plan consultation stage.

The Council will consider all representations received and undertake a detailed assessment of all the options, including new sites or broad locations submitted through the 2018 Call for Sites, through the process of sustainability appraisal and technical assessment. The outcome of this work will then be used to inform the development of a 'preferred approach' for public consultation at the Draft Plan stage.

The broad options for consultation are set out below and consist of a description of each of the options and a summary of both the opportunities and challenges associated with the development and delivery of each spatial option under consideration. This is provided to assist in assessing the appropriateness of each of the options. As part of this consultation, views are invited on whether there are any other opportunities or challenges that ought to be considered when assessing each option.

**The Council recognises that, as the process of preparing the Local Plan progresses, in addition to the options presented, the selection of sites may be further influenced by a number of factors, including:**

- **The consideration of new sites identified through the 'call for sites' process;**
- **The consideration of the contribution surplus Council assets can make to housing delivery;**
- **Additional sites coming forward as 'Windfall Sites' where the current use ceases and the site comes forward unexpectedly for redevelopment; and**
- **The refinement of site capacity figures based upon revisions to predicted densities or developable areas.**

## Baseline Situation – Current Core Strategy Approach

In line with national planning policy, the spatial strategy underpinning the adopted Core Strategy seeks to focus new development within the existing Thurrock Urban area in order to maximise the use of brownfield land and promote a sustainable pattern of development, which makes an efficient use of historic capital investment in retail, employment, transport, and community infrastructure. However, continuing with this approach without looking for additional growth options to accommodate

Thurrock's future development needs could lead to the following adverse impacts for the Borough and its residents:

- Based on the evidence in the HLAA, focusing development in the Thurrock urban area will only deliver approximately 6,478 new homes against an OAN of 31,763 homes, meaning that the Borough will fail to meet its identified housing need;
- Thurrock's current rolling 5 year land supply is less than 1.2 years placing the Council at risk of Government intervention or sanction under the proposed Housing Delivery Test;
- Under the presumption in favour of "sustainable development", planning permissions for development could be granted on appeal, leading to uncontrolled and sporadic development in the Green Belt against the wishes of the local community. This eventuality could also severely undermine the ability of the Council to plan for and deliver transformational change;
- The viability of many sites in the urban area for housing is constrained by their small size, high build costs and the economic values that can be achieved for other uses including retail and logistics related employment;
- The limited number of new homes that could be delivered under the current approach would fundamentally undermine economic growth in Thurrock, and potentially lead to increased levels of in-commuting and congestion on local roads, or the loss of future investment due to a lack of high quality and affordable housing for the future workforce;
- The limited viability of sites in the urban area means that developer contributions for affordable housing and the provision of new community facilities will be difficult to achieve and deliver;
- Additional housing development in the urban area could increase the strain on existing community facilities (schools and health) where there is already limited physical scope and capacity to meet existing needs; and
- Further development would increase transport movements within an already highly congested urban area leading to poorer air quality and adverse impacts on economic performance as journey time reliability declines.

For the reasons set out above, continuing with the current spatial strategy alone is not considered a realistic or viable option. To do so would lead to the production of a Local Plan which would ultimately be found unsound by an Inspector at Examination. Moreover, it would also constraint the future growth of the Borough and miss the significant opportunities to make Thurrock one of the most vibrant, exciting and economically successful places in the UK in which to live, work, and invest.

## **Options for growth**

It should be noted that the spatial options are not mutually exclusive, as the selection of more than one of the proposed options will need to be considered in order to meet the entirety of the Borough's future development requirements. Although 6 possible options are presented within this consultation document, the reality is that two or more of the options working in combination will be required to meet Thurrock's future housing needs and form part of the final preferred strategy

It should also be noted that some individual development opportunities may also fall under more than one of the broad spatial options highlighted below.

## **Option 1: Urban Intensification**

### **Approach**

Option 1 seeks to boost the supply of housing land within the built up area through the higher density development of urban sites. This could be achieved by

- The regeneration and re-configuration of existing housing estates;
- Reuse or redevelopment of vacant retail, office, commercial floorspace and car parks in town centres;
- Re-allocation of employment land, including the potential for the 'lift and shift' of non-conforming uses in residential areas; and
- The redevelopment of Urban Green Space.

Further work is required to identify the scale of new housing development which could be delivered through this Option and this will be taken forward as part of the ongoing HLAA process. However, given the characteristics of the Borough and the number and nature of the sites involved (typically small scale and located in or around town centres or areas in active employment use) it is not anticipated that this Option will contribute significantly to increasing the supply of housing land in Thurrock or in a manner that would improve people's quality of life.

**Insert Option Map – show Thurrock urban area and permitted/committed developments etc**

## **Option 1 Commentary**

### **Opportunities**

- Promotes a sustainable pattern of development which makes efficient use of historic capital investment in retail, employment, transport, and community infrastructure.
- Reduces the need for future Green Belt development.
- Enhances the viability and vitality of existing urban centres as a focus for shopping, leisure and community/cultural activity.
- Supports regeneration and re-use of existing land and property in the urban area.
- Potential to improve the residential amenity of areas currently being affected by employment uses and associated HGV movements, through the relocation of 'bad neighbour' uses to alternative sites/premises.

### **Challenges**

- Urban intensification would only marginally increase the supply of housing land due to the impact of time, cost, viability and market considerations.
- Potential to increase levels of housing delivery in existing town centres constrained by a lack of currently available sites and the time and costs associated with the land assembly process to bring together viable development opportunities.
- Potential to increase levels of housing delivery at Lakeside constrained by the retailers preferred operational models (access/servicing arrangements and surface level car parking), market considerations and the high land values associated with retail development.
- Re-allocation of strategically important employment land for housing would have an adverse impact on economic growth and job creation.
- The scope for 'lifting and shifting' of existing employment uses will only have a limited impact on increasing the supply of housing land in the urban area due to the scale and nature of these sites and the complex and practical difficulties of finding/providing alternative sites and premises and the viability of securing their remediation and redevelopment for housing.
- Higher density development within the urban area may not be viable given high build costs associated with flatted development.
- Higher density development could also have an adverse impact on the character and quality of the built environment and residential amenity.
- The potential loss of urban green space would further worsen existing standards of open space provision in the urban area with a consequential adverse impact on community health and well-being.

### **QUESTION 13**

#### **Urban Intensification**

- a) Do you believe that adopting the approach set out under this option is an appropriate option for consideration or, if not, why not?**
- b) Are there any other opportunities or challenges that you think ought to be taken into account in assessing this option?**
- c) What additional opportunities or interventions exist to increase the capacity of the urban area to accommodate a greater proportion of Thurrock's future housing needs?**

#### **Option 2: Duty-To-Cooperate**

##### **Approach**

**The National Planning Policy Framework (NPPF) requires local planning authorities to work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans. Through joint working,**

local planning authorities should collaborate and work together to meet development requirements which cannot wholly be met within their own areas.

The NPPF requires that local authorities ensure that their local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as it is consistent with the policies set out in the Framework; for example, policy constraints such as environmental designations or absolute constraints such as floodplains and land fill sites.

Thurrock has been working with the other South Essex authorities (Basildon, Castle Point, Rochford and Southend-on-Sea) to identify the level of need for new housing in the area through the preparation of the South Essex Strategic Housing Market Assessment (SHMA). The only way the Council will be able to plan for a lower figure than its objectively assessed need of 1,381 homes a year is if a neighbouring authority or authorities agrees, through the Duty To Cooperate process and preparation of the Joint Strategic Plan, to accommodate all or part of the unmet housing need which currently stands at over 25,000 new homes.

**[Insert Map]**

## **Commentary**

### **Opportunities**

- Potential mechanism to reduce the need for Green Belt development in Thurrock over the plan period to 2037/38.

### **Challenges**

- Current indications are that neighbouring local authorities will be unable to accommodate any part of Thurrock's future housing needs due to planning policy and physical capacity considerations and constraints. Further technical work has been commissioned by the South Essex authorities to identify, on a consistent basis, the capacity of the sub-region to accommodate future housing and employment growth including broad locations for strategic development to boost the supply of land for development.
- A failure to meet all, or a significant part, of Thurrock's future housing needs within the Borough would adversely impact upon the quality of life of Borough residents, undermine the local economy, and lead to an increase in commuting, thereby further adding to congestion on the local road network.

## **QUESTION 14**

**a) Do you believe that adopting the approach set out under this option is an appropriate option for consideration or, if not, why not?**

**b) Are there any other opportunities or challenges that you think ought to be taken into account in assessing this option?**

**c) What additional opportunities or interventions exist under the Duty To Cooperate process and the preparation of the Joint Strategic Plan to accommodate a proportion of Thurrock's future housing needs within one, or more, adjoining local authority areas?**

### **Green Belt Development Type 1: New Settlement**

The opportunity for developing one or more new settlements in Thurrock is severely constrained by the nature and character of the Borough and the existing pattern of spatial development and transport connectivity. Based on current evidence the only potential location for bringing forward a new settlement of a significant scale lies in the future development and expansion of West Horndon on land to the north and south of the C2C Fenchurch Street - Shoeburyness railway line.

The development of a new settlement at West Horndon would require significant funding for new education, health and community infrastructure given the limited scale and nature of existing provision within the existing settlement.

The proposed development of a new Garden Village settlement to the east of West Horndon at Dunton Village in Brentwood also raises a number of issues in relation to the cumulative Green Belt and development impacts of both proposals on the integrity of the Metropolitan Green Belt (Urban Sprawl), and the ability of the A127 corridor to support the scale of development proposed without significant capacity improvements.

Master Planning and Transport/Infrastructure Delivery Planning will be required to inform the further consideration of this option in order to establish the capacity of the area as a broad location to accommodate substantial housing growth and to provide the wide mix of supporting uses and infrastructure improvements necessary to achieve the sustainable development of a new strategic settlement in this location.

## **Insert Option Plan – showing West Horndon**

### **Commentary**

#### **Opportunities**

- Potential to deliver a new free standing settlement/Garden Village of a significant scale, focused upon West Horndon, on land north and south of the C2C Fenchurch Street to Shoeburyness railway line.
- Limited number of land owners involved would increase the deliverability of the project.
- Potential opportunities available to bid for Government funding to support the delivery of strategic infrastructure.

#### **Challenges**

- Given the visual, perceptual and functional separation of this broad location with the existing Thurrock urban area, it is questionable whether development at West Horndon would positively

contribute towards meeting Thurrock's future housing needs with development in this location more appropriately located to meet the needs of Brentwood or Basildon.

- Development at West Horndon is not well placed to provide a range of market or affordable housing to meet the needs of the residents of Thurrock or support the future development of Thurrock's key Economic Hubs given the physical separation and poor north-south connectivity of the area with the Ports, Thames Enterprise Park and Lakeside. Development in this location could lead to increased north- south commuting and an increase in travel costs for people on low incomes.
- The development of a new settlement of a significant scale at West Horndon would require considerable public and private sector investment in order to provide supporting community infrastructure. In view of acknowledged constraints on the availability of public funding, there is no guarantee that this would not come forward at the expense of competing infrastructure needs and proposals adjoining the Thurrock urban area at Aveley, Purfleet, South Ockendon, North Grays, Chadwell St Mary, East Tilbury and Corringham.
- Significant development at West Horndon would further exacerbate recognised capacity issues on the A127 corridor and it is uncertain as to whether, and when, Government funding will become available to address these issues.
- Development of scale south of the railway line at West Horndon could have significant environmental implications in terms of impact upon the Metropolitan Green Belt landscape character, and flood risk considerations.
- Development in this location and potentially at the adjoining Dunton Village site could have an adverse impact on the ability of Thurrock Council to bring forward large scale development adjacent to the Thurrock urban area which would otherwise support the regeneration of existing local communities and provide new housing in a more accessible location.
- Development in this location would reduce the spin-off economic benefits for businesses located within the Thurrock urban area, with residents more likely to shop in Basildon or Stratford than Grays or Lakeside.

#### **QUESTION 15**

- a) Do you believe that adopting the approach set out under this option is an appropriate option for consideration or, if not, why not?**
- b) Are there any other opportunities or challenges that you think ought to be taken into account in assessing this option?**
- c) Are there any other opportunities or broad locations within, or adjoining, Thurrock that you consider suitable for the development of a new settlement?**

## **Green Belt Development Type 2: Major Urban Extensions**

This Option identifies seven key locations in the Borough that have the potential to accommodate at least 1,500 homes as sustainable urban extensions. Taken together the areas identified have the potential for approximately 25,000 homes with associated education, health employment, retail and other supporting community uses. The areas being considered include:

### **South Ockendon**

This option identifies South Ockendon as having the potential to accommodate a strategic scale development through the comprehensive regeneration of the urban area alongside a large scale urban extension comprising an interlinked network of garden villages to the north and east of the existing urban area. Taken together the area has potential for 10,000 -12,000 new homes.

### **Aveley**

An urban extension at Aveley has the potential to accommodate over 2,100 homes, the regeneration of Aveley centre, new education and community facilities, improvements to the A13 corridor and connections into an extension of the South Ockendon Country Park.

### **Chadwell St Marys**

An urban extension at Chadwell St Marys has the potential to accommodate between 3,000-5,000 homes, the regeneration of Chadwell St Marys centre, new education and community facilities, upgraded transport links and generous strategic landscaping and open spaces.

### **East Tilbury**

An urban extension at East Tilbury has the potential to accommodate between 3,000 – 5,000 homes, with a higher density core area focused on a new transport interchange and mixed use centre, with education facilities and generous strategic landscaping and open spaces.

### **Corringham**

An urban extension at Corringham has the potential to accommodate over 1,500 homes, shopping, education and community facilities, a new railway station/transport hub (Corringham Parkway) together with significant areas of strategic open space with sports and recreation facilities.

### **Lakeside**

An urban extension on land at Arena Essex to the north of Lakeside has the potential to accommodate over 2,000 homes and additional community, educational and/or health facilities to support residential development across the wider area including the potential development of up to 750 -1,000 on land adjacent to the Lakeside Shopping Centre and retail parks.

### **North Grays**

An urban extension to the north of Grays have the potential to accommodate approximately 1,500 homes with associated amenities, local centre enhancements and a linear park offering leisure and recreational opportunities for existing and future residents.

In identifying these locations as possible areas for strategic housing growth the Council has had regard to the following considerations:

- Their location next to railway stations along high frequency transport corridors and/or accessibility by public transport providing direct access to key employment locations and

**retail and leisure destinations.**

- **Their co-location with areas in need of regeneration and investment in new and improved community infrastructure and local services to meet both existing and future need.**
- **Their location close to existing and expanding areas of employment growth including Lakeside, the Ports and Thames Enterprise Park.**

## **Insert Option Plan – showing large urban extensions as set out above**

### **Commentary**

#### **Opportunities**

- A more concentrated pattern of larger Green Belt allocations would generate the critical scale and mass of development required to fund and deliver transformational change and support the regeneration of existing urban centres such as Aveley, South Ockendon, Lakeside, Chadwell St Mary, East Tilbury and Corringham.
- Large scale high quality developments also provide the opportunity to change people's perceptions of Thurrock as a place to live and work and to provide a wide range of different housing typologies to meet a variety of housing needs. This includes the ability to increase the financial viability of delivering significantly greater levels of affordable housing.
- Larger strategic developments can provide the critical mass of development or physical space needed to support the provision of the full range of community facilities (primary/secondary schools, primary health facilities and retail/service uses) required to create new sustainable communities and address identified deficiencies in existing community infrastructure.
- Makes good use of historic investment in strategic public transport infrastructure and will help reduce the number of journeys and use of the car, as the location of new housing lies in close proximity to existing or proposed employment locations, town or local centres and key public transport hubs.
- Preserves the integrity of the Green Belt at a strategic level and reduces the need for numerous incursions into the Green Belt at the local level including preventing urban sprawl and coalescence of settlements.
- Large scale housing developments are more likely to attract Government funding support to cover the cost of up front infrastructure provision.

#### **Challenges**

- Large scale urban extensions are more complex to bring forward and take longer to deliver as they may require the provision and forward funding of critical elements of strategic infrastructure.

- Co-ordinating the efforts of landowners, developers and infrastructure providers to ensure that the 'whole is greater than the sum of parts' will require the development of be-spoke delivery arrangements and funding mechanisms.

#### **QUESTION 16**

- a) Do you believe that adopting the approach set out under this option is an appropriate option for consideration and if not, why not?**
- b) Are there any other opportunities or challenges that you think ought to be taken into account in assessing this option?**
- c) Are there any other opportunities or broad locations within, or adjoining Thurrock, that are suitable for considering the development of a large urban extension?**

#### **Green Belt Development Type 3: Small Urban Extensions**

This option proposes development of a larger number of smaller urban extensions (less than 1,500 homes) on a range of sites capable of accommodating typically 50-500 houses across Thurrock in green belt urban fringe locations adjacent to the main urban areas in the borough.

Further work is required to identify the scale of new housing development which could be delivered through this Option and this will be taken forward as part of the ongoing Housing Land Availability Assessment (HLAA) and Integrated Assessment processes.

#### **INSERT OPTION PLAN – show smaller urban fringe sites locations**

##### **Commentary**

##### **Opportunities**

- Makes good use of historic investment in infrastructure and reduces/disperses the impact of new development and associated infrastructure burdens across a wider area.
- Could reduce the need for large scale strategic infrastructure provision that might otherwise be needed to support the development of major urban extensions.
- Reduces the need for, and impact of, significant incursions into the Green Belt that could occur from focusing on fewer but larger urban extensions.
- Provides the opportunity to increase the diversity of the Borough's housing offer by providing a variety of locations and settings for new housing development.

- Could potentially reduce the impacts of large scale development on the landscape by promoting smaller scale development more in keeping with the local context.
- Could support localised improvement and enhancement of spoiled countryside and provide access to new open space and recreational opportunities for those communities adjacent to the urban fringe.

## **Challenges**

- A more dispersed pattern of development would be unlikely to generate the critical scale and mass of development required to fund and deliver transformational change and support the regeneration of existing urban centres and local communities.
- Dispersed development could have significant consequences at the local level in terms of the Green Belt and its function in preventing urban sprawl and the coalescence of settlements.
- Funding the delivery of necessary strategic infrastructure improvements will be more difficult to coordinate and achieve if development is spread across a larger number of small sites. This includes the ability to successfully bid for and obtain Government funding support.
- This option is likely to lead to an increased number of journeys and use of the car as the location of housing developments may not lie in close proximity to existing or proposed employment locations, town or local centres and key public transport hubs.
- A dispersed pattern of development may not provide the critical mass of development or physical space needed to support the provision of the full range of community facilities (primary/secondary schools, primary health facilities and retail/service uses) required to create new sustainable communities or address identified deficiencies in existing community infrastructure.
- Although the redevelopment of Previously Developed Land (PDL) can have positive benefits in terms of the reuse of vacant or spoiled land in the Green Belt, many locations are unsuitable for development due to their relative isolation and poor access to essential services, employment locations and public transport hubs.

## **QUESTION 17**

- a) Do you believe that adopting the approach set out under this option is an appropriate option for consideration and if not, why not?**
- b) Are there any other opportunities or challenges that you think ought to be taken into account in assessing this option?**
- c) Are there any other sites or broad locations within Thurrock suitable for considering the development of further small urban extensions**

#### **Green Belt Development Type 4: Village Expansion**

This approach seeks to focus further larger scale development around the villages of Bulphan, Orsett and Horndon on the Hill in order to make them self-sufficient and reduce the need for local people both now and in the future to travel to other larger centres in order to meet their shopping, employment and other needs.

The implementation of this approach would require significant local investment in new infrastructure (schools, health and community uses) to meet future demand. Additional retail development would also be required to upgrade existing provision.

Further work is required to identify the scale of new housing development which could be delivered through this Option and this will be taken forward as part of the ongoing Housing Land Availability Assessment (HLAA) and Integrated Assessment processes.

#### **Insert Option Plan – Village expansion around Bulphan/Hordon on the Hill and Orsett**

##### **Commentary**

##### **Opportunities**

- Critical mass of new development would support the provision of new retail, leisure, community, and local employment provision reducing the need for residents to travel outside the local area.
- An increase in the local population would raise the demand/viability of providing improved or new public transport services.
- Approach would support the provision of a wide range of housing types, including affordable housing, to meet the needs of the local population.

##### **Challenges**

- Large scale development both within and adjoining the villages of Bulphan, Orsett and Horndon on the Hill would have a significant adverse impact on the environmental quality and character of the villages.
- The scale of development envisaged under this option would go beyond the natural capacity of the villages and their setting to absorb growth and leading to irreversible damage to their character and the physical and natural environment.
- Large scale development in the vicinity of the villages would lead to a significant increase in local congestion as traffic movements exceed the capacity of the local network to accommodate the levels of growth being considered.
- Development of scale in these locations could fundamentally undermine the openness of the Green Belt surrounding Bulphan, Orsett and Horndon on the Hill as well as potentially leading to

the coalescence of settlements (Orsett and Horndon on the Hill) contrary to national planning policy guidance.

#### **QUESTION 18**

- a) Do you believe that adopting the approach set out under this option is an appropriate option for consideration and if not, why not?**
- b) What scale of additional development would be appropriate in these areas and what additional infrastructure would be needed to support housing growth in these areas?**
- c) Are there any other opportunities or challenges that you think ought to be taken into account in assessing this option?**

#### **Development Type 5: Other**

This approach proposes development in the Green Belt on sites that are somewhat isolated and do not easily connect with existing settlements. Unlike Green Belt Development Types 1 and 2, these sites are not of a scale where they could realistically provide additional on-site infrastructure like retail, community and educational facilities.

Further work is required to identify the scale of new housing development which could be delivered through this Option and this will be taken forward as part of the ongoing Housing Land Availability Assessment (HLAA) and Integrated Assessment processes.

#### **Insert Option Plan – showing free standing green belt sites broad locations**

##### **Opportunities**

- Could contribute towards the reuse and redevelopment of previously developed land (PDL) in the Green Belt.

##### **Challenges**

- A more dispersed pattern of development would be unlikely to generate the critical scale and mass of development required to fund and deliver transformational change and support the regeneration of existing urban centres and local communities.
- At a strategic level isolated development could have significant adverse consequences in terms of the openness of the Green Belt and at the local level in terms of its function in preventing coalescence of settlements.

- Isolated sites not in close proximity to existing centres, employment locations or transport corridors and hubs would lead to an increase in journeys by car use.

#### **QUESTION 20**

- a) Do you believe that adopting the approach set out under this option is an appropriate option for consideration, if not why not?**
- b) Are there any other opportunities or challenges that you think ought to be taken into account in assessing this option?**
- c) Are there any other free-standing previously developed sites which should be considered for development?**

## SECTION 5: WHAT LEVEL OF GROWTH IS NEEDED – EMPLOYMENT LAND

In 2014, Thurrock's economy was estimated to be worth around £2.878bn with employment levels having recovered quickly following the economic downturn. Looking ahead, it is forecast that the Thurrock economy will grow by an average of 3.2% per annum between 2012 and 2030 and that total employment will grow by an average of 1.5% a year, equivalent to an increase of 21,200 jobs in Thurrock over the same period.

The main employment sectors in the Borough are transport and logistics, port functions and retail. The strength of these sectors reflects some of Thurrock's key locational advantages, such as its close proximity to London and international gateways (ports and airports), which make it an attractive proposition for continued inward investment and job creation.

Government policy is committed to building a strong and competitive economy in order to create jobs and prosperity. To help achieve economic growth, Paragraph 21 of the NPPF states that local planning authorities are required to:

- Set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;
- Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
- Support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the Plan and to allow a rapid response to changes in economic circumstances;
- Plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;
- Identify priority areas for economic regeneration, infrastructure provision and environmental enhancement;
- Facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.

The Core Strategy approach is based on promoting and supporting economic growth and development through the provision of land, premises and supporting infrastructure in five Key Strategic Economic Hubs across the Borough. These comprise Purfleet, Lakeside/West Thurrock, Grays Town Centre, Tilbury and London Gateway. In preparing the Local Plan, the Council will need to consider whether this strategic approach remains appropriate or whether it needs to be revised to include, for example, Thames Enterprise Park at Coryton, as a sixth Strategic Economic Hub. Alternatively, a different spatial approach could be to reduce the number of Economic Hubs by amalgamating two or more of the existing Hubs to form three larger composite economic hubs – Thurrock West (including Purfleet, Port of Purfleet and Lakeside), Thurrock Central (including Grays Town Centre, Tilbury and the London Port of Tilbury) and lastly Thurrock East (including London Gateway and Thames Enterprise Park).

Despite the challenging economic environment that existed at the time of the Core Strategy's adoption in 2011, the Plan has been instrumental in attracting significant inward investment into the Borough, leading to a faster rate of jobs growth in Thurrock than either the national or regional average. Testimony to this are the levels of private sector investment which has/will be generated by proposed or committed development at London Gateway, Thames Enterprise Park, Lakeside, Purfleet and the Port of Tilbury.

Reflecting the comments made by stakeholders and local businesses in response to the previous Issues and Options (Stage 1) Public Consultation, the new Local Plan must identify an adequate and appropriate mix of land and property to meet forecast growth in jobs; the need to support efforts to diversify the Borough's unbalanced employment base; and to coordinate provision of essential supporting infrastructure - e.g. housing, transport, utilities, broadband/communications infrastructure. The consultation responses also pointed to the need to give further consideration to the allocation of additional land for development outside the identified hubs, particularly to meet the needs of SMEs and the logistics industry.

In preparing the new Local Plan, the Council will need to develop a clear understanding of business needs within the economic markets operating within the Borough and wider Thames Gateway South Essex area. This will include an assessment of the need for additional land or floorspace for economic development, including both the qualitative and quantitative needs for anticipated types of economic activity over the plan period. In order to do this, the Council, on behalf of the South Essex authorities, commissioned the preparation of the South Essex Economic Development Needs Assessment 2017 (EDNA), which provides an evidenced analysis of the economic and employment land opportunities and challenges for South Essex. The study also identifies the future demand for employment land (B1, B2 and B8) and sets out a series of policy recommendations on how the South Essex authorities should plan to meet future employment land requirements across the area at both the district and sub-regional levels. In addition to the EDNA, the Council also commissioned the preparation of the Thurrock Employment Land Supply Availability Assessment 2017 (ELAA). This study provides an updated assessment of the availability and suitability of employment land across Thurrock. These two studies feed into each other, with the economic forecasting work undertaken as part of the EDNA informing the ELAA, and the ELAA's determination of the balance between employment supply and demand with its locally distinctive objective assessment of employment needs contributing to the strategic sub-regional conclusions set out in the EDNA.

#### INFORMATION

Both the South Essex Economic Development Needs Assessment 2017 (EDNA) and the Thurrock Employment Land Availability Assessment Update 2017 (ELAA) are available to view at the Council's Local Plan website. ([www.thurrock.gov.uk/localplan](http://www.thurrock.gov.uk/localplan)).

### Key findings and conclusions

**Figure 13** sets out the combined employment land requirements identified in the Economic Development Needs Assessment for Thurrock over the period to 2036 broken down into office (B1), manufacturing (B2) and warehousing (B8) uses. The analysis shows that two thirds of South Essex's future employment land requirements are focused in Thurrock, with warehousing being the predominant sector of demand. The combined employment floorspace requirement for Thurrock is 1,050,397 sq.m of new floorspace, which translates into an employment land requirement of 259 hectares to be provided to meet future needs in full.

**Figure 13: EDNA – Thurrock Combined Employment Land Requirement to 2036**

Floorspace (sqm)	Total	Office	Manufacturing/Industrial	Warehouse
Thurrock	1,050,397	30,137	55,202	965,058
<b>Total South Essex</b>	<b>1,564,375</b>	<b>358,438</b>	<b>159,042</b>	<b>1,046,824</b>
LAND (ha)				
Thurrock	259	4	14	241
<b>Total South Essex</b>	<b>345</b>	<b>44</b>	<b>42</b>	<b>260</b>

Source: Draft South Essex Economic Development Needs Assessment 2017

In arriving at an overall requirement of 259 hectares of employment land over the period to 2036, the EDNA assumes that Thurrock could reasonably be expected to see a 40% uplift in future industrial activity as a result of the re-location of existing industrial activity from London, with a split of 30% industrial and 70% distribution. This reflects the expectation that Thurrock is well placed to accommodate a significant proportion of any displaced industrial activities, particularly distribution. Reflecting these considerations, the total future requirement of 259 hectares includes an allowance of 95 hectares to accommodate forecast London industrial land re-location requirements.

The EDNA also compares the existing employment land supply within each of the South Essex authorities with the projected future employment and requirements for each authority. As set out in **Figure 14** below, it is estimated that the total supply of employment land currently available for development is 652 hectares which comfortably outstrips the projected total employment land requirement of 259 hectares over the period to 2036. However, it should be noted that the majority of this available supply includes land at London Gateway (249.7ha), which has consent for 82,9700 sqm under the London Gateway Logistics Park Local Development Order; land at Thames Enterprise Park (180.8 ha), which is currently promoted for 320,000sqm of B1, B2 and B8 floorspace; and 126ha of land at the former Tilbury Power Station, which is also now the subject of a proposal for the expansion of the Port of Tilbury. Taken together, this equates to some 570.4 ha of the identified supply of employment land which has or is in the process of being master planned to accommodate future strategic employment needs. The capacity of these sites to accommodate residential development is also further limited due to the presence of constraints under the Health and Safety Executive Control of Major Accident Hazards (COMAH) Regulations and Environment Agency Flood Risk Regulations which also serve to render these locations unsuitable for housing development.

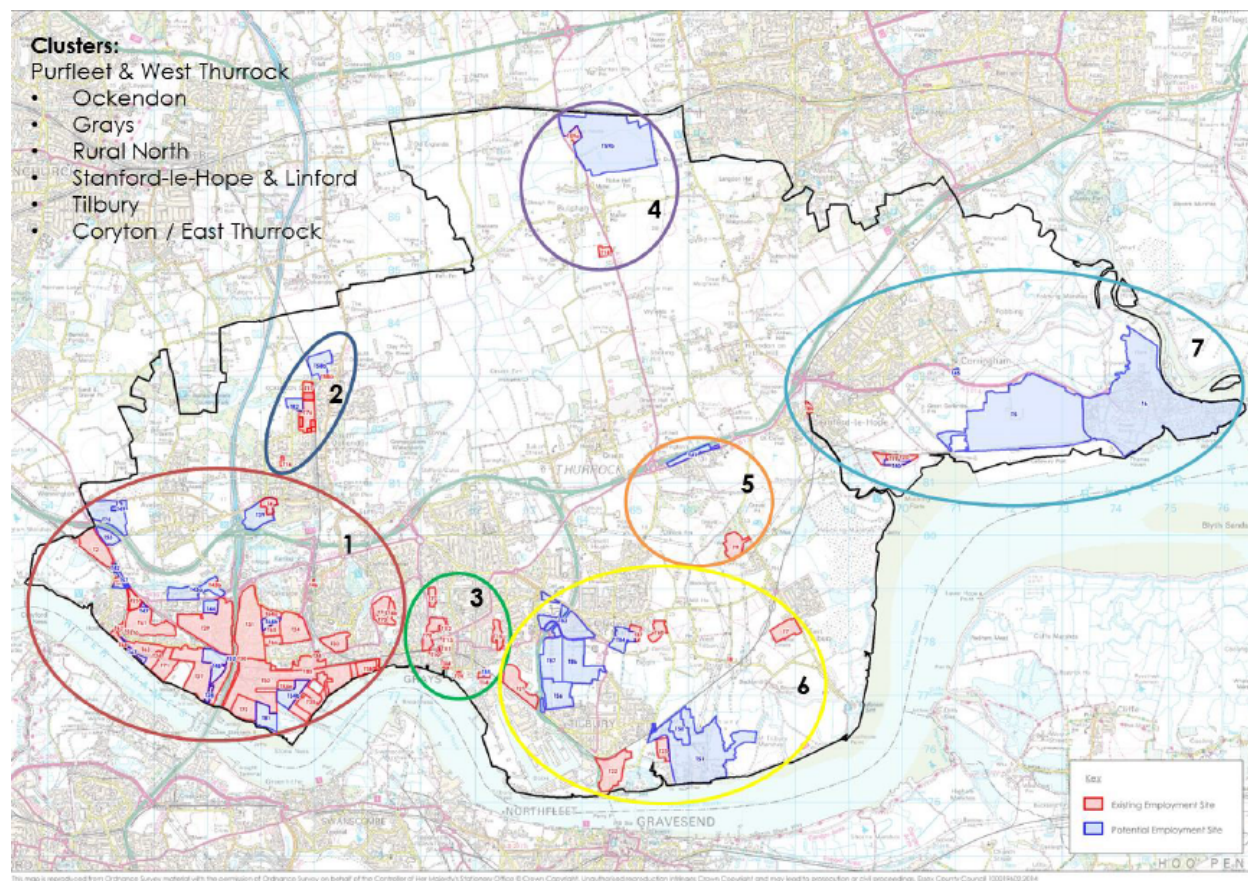
**Figure 14: Balance between Total Land Supply and Demand in South Essex**

	Total Employment Land Supply (ha)	Total Employment Land Demand (ha) – Combined scenario	Total Employment Land Demand (ha) – Combined scenario with supply side adjustment	Employment Land Demand as % of Supply
South Essex	941	272	345	29% or 37%
Thurrock	652	244	259	26% or 28%

Source: Draft South Essex Economic Development Needs Assessment 2017

**Figure 15** shows the broad distribution of employment land in Thurrock, with West Thurrock hosting the largest single concentration of employment activity in the Borough. Noticeable also is the fact that much of the Borough's potential future employment land supply is focused on land at London Gateway and Thames Enterprise Park.

**Figure 15 EDNA Thurrock Overview Map: Existing and Potential Employment Clusters**



## Key issues

Based on the evidence and analysis set out in the South Essex Economic Development Needs Assessment, the Thurrock Employment Land Availability Assessment and the Issues and Options (Stage 1) Report of Consultation, the preparation of the Local Plan will need to consider and respond to the following issues:

- There is a significant oversupply of employment land in the Borough relative to future demand generated in Thurrock. However, much of this capacity is tied up in strategic land holdings at London Gateway, Thames Enterprise Park and Port of Tilbury related to ports and logistic development.
- Although there is an identified oversupply of employment land to meet Thurrock's future needs, when seen in the context of South Essex, the Borough's employment land supply provides two thirds of the wider area's future strategic land supply.

- The concentration of future supply in a few large sites on land retained for port related logistics activity means there is little flexibility in the existing employment land portfolio to accommodate non-port related employment uses.
- With the potential for significant employment generation at London Gateway and Thames Enterprise Park, there is also a need to deliver major improvements to their accessibility, particularly by public transport, and to ensure there is sufficient capacity for additional freight movements by rail.
- The lack of flexibility in the Borough's overall employment land portfolio means that a potential need exists to identify additional land for facilitating the 'lifting and shifting' of non-conforming employment uses out of residential areas and in supporting the growth and expansion of SMEs and start-up businesses.
- There is a need to consider what planning policy tools can be used to provide /maintain a portfolio of sites to meet the needs of SMEs. This could relate to the % of site or floorspace to be reserved for their development.
- The future role of the town centres and housing growth areas to accommodate SMEs and business start-up units should be considered as part of the plan-making process.
- Possible role for the Council in facilitating the direct provision of low cost accommodation to meet the needs of SMEs and support the 'lift and shift' process, as the Thurrock employment land market is dominated by demand for large B8 units and port-related uses.
- There is a perceived need for additional lorry parks but future provision should be accommodated on-site/within major developments.
- There is a need for further road, rail-freight and digital infrastructure improvements generally.
- It is not possible to predict the likely economic impacts of the Lower Thames Crossing until the scheme has been confirmed, including provision/location of junctions.
- Complementary policy support needs to be provided to attract businesses, which includes ensuring the presence of a skilled local workforce and suitable housing to attract and retain employees.

Thurrock has experienced a prolonged and steady increase in jobs and this is forecast to continue into the future through the expansion of existing businesses and development of new ones. Land will be required to meet these business development needs.

The Local Plan will need to consider the issues of how much employment land is required and, broadly, where it should be allocated, but there is more to employment land than simply the amount and where it should be located. The Plan will also need to consider what type of employment land is required (what type of end-user will occupy the land) and whether the provision of certain employment uses is appropriate in certain locations. The following options (which are not mutually exclusive) consider these issues:

**Option 1 - Allocate sites specifically for strategic distribution and warehousing needs.** Larger sites would be allocated specifically for strategic distribution and warehousing uses, close to the strategic road network and with direct access to inter-modal facilities.

**Option 2 - Allocate sites to encourage geographical clusters of specialist employment uses.** New sites would be provided for specific employment uses where similar activities could concentrate.

For example, a site or sites could be provided for forecast growth in emerging business sectors or for start-up businesses which may be compatible with residential uses in housing growth areas. Such an approach may require a more flexible range of uses being permitted than just business class use. It could also require a site specific policy rather than a single policy that deals with the employment land portfolio collectively.

**Option 3 - Allocate all new sites for the range of B classes uses (business, general industry and warehousing).** This option would allocate all employment sites for the range of business use, without identifying any sites for specialist employment uses as above, but a % of each site or broad location would be reserved in policy for SME and small scale start-up businesses.

**Option 4 – Allocate employment sites specifically for non-B8 uses.** This option would allocate sites for B1, B2 and sui generis uses in order to diversify the Borough's economic base and prevent an oversupply of B8 employment uses relative to future need and demand.

**Option 5 - Identify additional town centre mixed use development sites.** Land would be allocated in and around existing centres specifically for additional office uses. It would contribute towards the regeneration and re-use of brownfield sites. However, the Borough is not a significant office location, and evidence predicts that the demand for new office floorspace in Thurrock is likely to be limited.

#### QUESTION 21

a) When considering how land should be allocated for employment sites, which policy options above do you think are the most appropriate for Thurrock and why?

b) Are there any alternative options that you think are appropriate that have not been considered? If so, what are they?

c) Should sites be specifically allocated for non-B8 uses to help diversify the Boroughs economic base? If so, where?

d) Are there any specific sites or broad locations which should be identified for new employment uses? If so, where and why?

e) What additional transport or other infrastructure improvements are needed in Thurrock to support future economic growth?

f) Is there a need for additional lorry parks to serve business and industry in Thurrock? If so, where should they be located?

#### Existing employment areas

Alongside potential land allocations, there are significant existing employment areas in Thurrock which provide for a wide range of employment, business and commercial activities.

The existing Core Strategy employment policies are based round a 'tiered' approach that identifies different types of employment areas with some variation of uses permitted within them. There is a need to ensure that existing employment areas and premises continue to meet a diverse range of business needs, and consider if it would be appropriate for them to allow alternative commercial needs beyond the traditional employment uses of business, general industry and warehousing. Since

the Core Strategy was adopted in 2011, reform of the General Permitted Development order has resulted in a relaxation of the planning rules regarding changes of use from offices and warehousing to residential use, under certain circumstances.

#### **QUESTION 22**

**a) What kind of protection should the Local Plan give to existing employment areas?**

**b) Should the Local Plan seek to restrict the range of uses and activities in existing employment areas to B1, B2 or B8 uses, or designate selected employment areas in whole, or in part, for non-business class users?**

The Thurrock Employment Land Availability Assessment identifies a number of locations across the Borough where existing concentrations of employment uses are located within primarily residential areas. There is evidence that their presence is having an adverse impact on the amenity of local residents, particularly as a result of the impact of HGV movements, road safety considerations and noise. Although the Council regularly takes enforcement action against persistent offenders, in many cases it is not the fault of the occupiers that these issues arise, with the problem often lying with delivery vehicles operated by other companies. Equally, many of the businesses in these areas provide a valuable source of employment and contribute to meeting the wider needs of the community and business in Thurrock. Any attempt to relocate these businesses against their will could potentially see the loss of local jobs and harm the local economy.

However, this does not mean that further action shouldn't be taken to reduce or eradicate the impact of bad-neighbour uses in residential areas.

As part of this process, the Local Plan can plan positively to secure the voluntary relocation of existing business occupiers to alternative locations, where their hours of operation and room for expansion/diversification of activity is unconstrained by the nature of the surrounding uses. In order to do this, it will be necessary for the Plan to identify a range of sites capable of accommodating the displaced uses in affordable and appropriate premises, and for the Council and other partners to develop a programme to assist existing business occupiers to relocate as necessary.

#### **QUESTION 23**

**a) What policy approaches should the Local Plan develop to deal with the problems caused by bad-neighbour uses in residential areas?**

**b) Should the Council develop a programme for 'lifting and shifting' bad-neighbour uses to alternative locations? If so, what interventions are required for the successful delivery of this policy objective?**

### **Digital infrastructure**

In the Housing White Paper - Fixing our Broken Housing Market, the Government set out its intention (subject to consultation) to require local authorities to have planning policies which set out how high quality digital infrastructure would be delivered in their area. As part of this process, Government

is considering how to capitalise on new developments and the digital infrastructure attached to them, to enhance broadband coverage for local communities and nearby residents.

In March 2018, the Government published draft revisions to the National Planning Policy Framework for consultation, including proposed guidance designed to support the provision of high quality communications. The NPPF noted that advanced, high quality and reliable communications infrastructure is essential for economic growth and social wellbeing. To achieve these objectives, the draft text for consultation proposed that planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. In doing so, policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time, with priority being given to full fibre connections to existing and new developments.

Reflecting the date of its 2011 adoption, the Core Strategy does not set out a strategy or planning policies for promoting the provision of high quality digital infrastructure. In preparing the new Local Plan it is therefore essential that the plan-making process takes into account the need to provide an effective policy framework to facilitate the roll out of improved digital infrastructure across Thurrock to support future economic growth and meet wider social and community needs.

#### **QUESTION 24**

- a) What is the scope and nature of the planning policy support required to facilitate the roll out of high quality digital communications infrastructure in Thurrock?**
- b) What interventions or policy approaches does the Local Plan need to identify to assist in its delivery?**
- c) Should future planning policy require the direct provision of full fibre connections to all new residential and business developments and should Section 106 or CIL contributions collected from all forms of new development be targeted at supporting the provision of enhanced digital infrastructure in Thurrock?**

## **SECTION 6: WHAT LEVEL OF GROWTH IS NEEDED – RETAIL AND LEISURE**

### **Context**

Town centres are at the heart of community life and play a key role in shaping people's perceptions of an area. Attractive, vibrant and prosperous town centres can act as an important catalyst for attracting growth and investment into the wider area. Equally, declining centres can have the opposite effect and serve to deter and undermine efforts to turn the economic fortunes of an area around.

Over the last five years, town centres have faced the challenge of major economic and social change which has had an impact on the way we shop, the development of new retail formats and changing patterns of retail development. This has been manifest in the rise in internet shopping, the rapid growth of discount retailers and the 'convenience' shopping concept, the consolidation and concentration of investment into fewer larger centres and an overall decline in the demand for town centre retail floorspace in all but the largest and most successful centres.

To ensure the vitality of town centres, paragraph 23 of the NPPF requires that 'planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres'. This includes a requirement that 'needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability'.

National policy also requires Local Plans to be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. In terms of a retail evidence base, paragraph 161 states that local authorities should assess:

- The need for land or floorspace for economic development, including both the quantitative and qualitative needs, for all foreseeable types of economic activity over the plan period, including for retail and leisure development;
- The role and function of town centres and the relationship between them, including any trends in the performance of the centres;
- The capacity of existing centres to accommodate new town centre development;
- Locations of deprivation which may benefit from planned remedial action.

The Core Strategy defines the hierarchy of centres in Thurrock and sets out the Council's commitment to the transformation of the northern part of the Lakeside Basin into a new regional centre through the plan-making process and the preparation of an Inset Plan for the area. Policy CSTP7 also sets out the Council's support for the regeneration of the Borough's wider network of centres, with particular reference to the need to promote Grays town centre as a focus for cultural, administrative and educational functions, whilst providing retail development that is complementary to the Lakeside Basin.

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. In preparing the new Local Plan, the Council will need to review the existing policy approach and identify the need for additional guidance on the scale and location of new retail and leisure development across the Borough. The Council will also need to prepare more detailed town centre development and regeneration strategies which coordinate, prioritise and implement a range of measures which seek to maintain the viability and vitality of the Borough's wider network of Town, District and Local Centres.

### **Identifying future retail and leisure needs**

The NPPF and PPG place a duty on local planning authorities to cooperate on strategic cross-boundary planning issues including the provision of retail and leisure development.

In April 2016, Peter Brett Associates LLP (PBA) were instructed by the South Essex Authorities to provide a strategic retail evidence base for the South Essex sub-region. The objectives of this study included a requirement to assess the need for additional convenience and comparison retail floorspace and key high order leisure uses in the period up to 2037 and to recommend options for the spatial distribution of the assessed retail and leisure needs across the five authorities.

## **Key findings affecting Thurrock**

The key findings and conclusions set out in the South Essex Retail Study key in relation to Thurrock are summarised below:

- Across South Essex there is capacity to support an additional 82,445 - 185,485 sqm.net of comparison floorspace up to 2037.
- Long-term comparison capacity forecasts (post-2026) are significant but should be treated as indicative.
- Despite the existing large commitment at Lakeside (in the form of the consented Northern Extension) the majority of capacity emerges in Thurrock.
- Lakeside shopping centre is the primary comparison retail destination within the South Essex area and exerts a significant influence over trading patterns across the wider study area.
- Within Thurrock there is capacity to support an additional 171,858 - 185,485 sqm.net of comparison floorspace up to 2037.
- Across South Essex there is no capacity to support additional convenience floorspace up to 2031. This is due to there being significant commitments for convenience floorspace in Thurrock and because growth in convenience expenditure is limited.
- Long-term convenience capacity forecasts (post-2031) are much lower than the comparison figures, with little or no capacity emerging in Thurrock, but should also be treated as indicative.
- Across South Essex there is capacity to support an additional 8,346 - 12,342 sqm.net of convenience floorspace up to 2037.
- Within Thurrock there is capacity to support an additional -1,632 to 131 sqm.net of convenience floorspace up to 2037.
- Thurrock is anticipated to see the biggest rise in leisure spending in South Essex over the plan period due to population increase and increasing strength/inflow of expenditure to Lakeside.
- A3-A5 uses account for approximately 70% of the total leisure spending growth in South Essex. Basildon, Southend and Thurrock experience the most significant levels of growth.
- Basildon, Southend and Thurrock all have committed leisure developments. It is possible that the A3-A5 and D2 leisure commitments in Thurrock will be sufficient to absorb the forecast expenditure. The majority of this development is proposed at Lakeside Shopping Centre.

- With the exception of Basildon, there is capacity for cinema screens in all of the South Essex authorities. The most significant capacity is in Rochford, as it currently has no cinema screens.

## INFORMATION

A copy of the South Essex Retail and Leisure Study is available to view on the Council's Local Plan website. ([www.thurrock.gov.uk/localplan](http://www.thurrock.gov.uk/localplan))

## Question 25

**a) Based on the findings and conclusions set out in the South Essex Retail and Leisure Study, do you agree that Lakeside should continue to be the principal focus for new comparison shopping and leisure floorspace in Thurrock over the Plan period to 2017? If not, why not?**

**b) In the absence of a strong quantitative need for additional convenience floorspace provision in Thurrock over the plan period to 2037, what steps should the Council take to seek a better alignment of current/future provision, in order to meet the shopping needs of the proposed housing growth areas and/or the regeneration of existing centres?**

## Future planning status of Lakeside

The principle of transforming the northern part of the Lakeside Basin into a sustainable, mixed-use regional town centre is established in policy through Policy CSTP7: Network of Centres, of the adopted Thurrock Core Strategy (December 2011).

Policy CSTP7 restates the former East of England Regional Spatial Strategy's policy intention to secure the designation of the northern part of the Lakeside Basin as a Regional Town Centre subject to progress being achieved against a series of planning policy and development pre-conditions. In planning for the future development of Lakeside, the key issues the Local Plan will need to consider are:

- The need for any place-making criteria or triggers to create a viable, mixed-use regional town centre; and
- The policy choices and spatial options for managing development at Lakeside

In developing the Local Plan, it is the Council's intention to prepare an Inset Plan which will set out a detailed spatial strategy to guide the future development of the northern part of the Lakeside Basin. This will be informed by the preparation of an updated version of *Planning for the future of the Lakeside Basin – A Framework to Deliver Town Centre Potential (2015)*.

## INFORMATION

A copy of Planning for the future of the Lakeside Basin – A Framework to Deliver Town Centre Potential (2015) is available to view on the Council's Local Plan website. ([www.thurrock.gov.uk/localplan](http://www.thurrock.gov.uk/localplan)).

## Place-making criteria

It is the clear intention of the adopted Core Strategy and the former East of England Regional Spatial Strategy (RSS) that the future development of the Lakeside Basin should be progressed having regard to a range of place-making criteria for managing the development of a new sustainable mixed-use regional scale town centre.

Although the RSS has since been revoked, at the time of the Core Strategy's adoption it formed part of the statutory development plan for Thurrock. Policy ETG2: Thurrock Key Centre for Development and Change (from the revoked RSS) set out detailed place-making guidance on the changes required before the Lakeside Basin could achieve town centre status. Having regard to the policy approach set out in RSS policy ETG2, the Thurrock Core Strategy provided further guidance on the steps that would need to be taken before town centre status could be achieved.

However, as Policy CSTP7 dates back to 2011, it is now considered to be largely out-of-date as it fails to reflect changes to national policy or the changing retail and market context within which any decisions on the future development of Lakeside must now be made. Reflecting these considerations and the importance of the Lakeside Basin to both the local economy and community, the Local Plan will need to provide an up-to-date and more relevant planning policy framework, which reflects the progress made over the last 7 years in diversifying the nature of the uses at Lakeside and the changing national policy context set out in the NPPF.

### QUESTION 26

- a) Should the new Local Plan set out any pre-conditions limiting the future scale, nature, location and timing of additional retail development at Lakeside?
- b) With the addition of a wider range of uses and activities in recent years, including the provision of new leisure, hotel and food and drink uses, and with new residential development in the pipeline, should the northern part of the Lakeside Basin now be regarded as a fully fledged town centre?

## Policy choices and spatial options for managing development at Lakeside

Paragraph 23 of the National Planning Policy Framework requires that planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities are asked 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.

In view of the scale of the area included within the northern part of the Lakeside Basin, the Local Plan will need to define an effective boundary for the town centre and identify the primary and secondary shopping areas. The nature and extent of these areas will strongly influence decisions on future proposals for retail development and other uses, both within, and adjoining the areas covered by these policy designations

Once these policy designations have been agreed it is intended that they will be set out in an Inset Plan covering the northern part of the Lakeside Basin.

## **QUESTION 27**

- a) How should the Town Centre Boundary at Lakeside be defined?**
- b) How should the Primary and Secondary Shopping Areas at Lakeside be defined?**

## **Grays Town Centre**

### **Development context**

Grays is the largest 'traditional' town centre in Thurrock and contains 66,300 sqm gross floorspace in total. Whilst the town centre's role as the dominant retail centre in the area has been superseded by Lakeside Shopping Centre, it is still the main administrative centre in the Borough and a focus for a number of services and cultural activities.

Today, comparison provision in the centre is limited and only makes up around a quarter of all floorspace in the town centre. This comparison provision is made up from national multiple retailers alongside small independent local traders. Currently there is little demand from comparison goods retailers for representation within the town centre.

The town centre has a stronger provision of convenience floorspace with a large Morrisons supermarket, an Iceland foodstore and an Aldi foodstore. The centre also contains a range of other small convenience stores and specialist foodstores. Demand exists for further convenience floorspace within the town centre from discount foodstore operators.

Policy CSTP7 of the Adopted Core Strategy provides a policy framework for the future regeneration of the town centre as a focus for cultural, administrative and educational functions, whilst providing retail development complementary in function to that available at Lakeside Basin. In support of this objective, the plan identifies the opportunity to provide up to an additional 11,500 sqm net of pure and bulky comparison goods floorspace, together with a further 1,500 - 2,000 sqm net of additional convenience floorspace within the town centre over the period to 2026. In accommodating this growth, the plan states that development should be of an appropriate scale and be well integrated with the existing centre.

At present there is no evidence to suggest that sufficient market or retailer demand exists to support the scale of additional comparison goods floorspace development within the town centre as identified in Policy CSTP7. Moreover, there is also a lack of suitable and available sites within, or on the edge of the town centre, capable of physically accommodating the scale of development proposed for new convenience or comparison shopping floorspace.

A key issue for the Local Plan is whether the current policy approach needs to be amended to reflect the reduced scale of demand for new comparison goods floorspace within the town centre, whilst also recognising the increasing importance of consolidating retail activity within or adjoining the existing primary shopping area. At the same time consideration will also need to be given as to how the need for some flexibility to accommodate non-retail uses, where they will contribute to the vitality and attractiveness of the town centre, can be introduced without harming Grays retail function.

## **QUESTION 28**

- a) Do you think that the Local Plan should plan positively for additional comparison or convenience shopping floorspace in Grays Town Centre through the specific allocation of additional sites for development or should the focus be on strengthening and**

**consolidating retail activity around the Grays Shopping Centre and adjoining areas?**

- b) Should the Council amend the current approach to managing the mix of permitted uses in Grays Primary and Secondary shopping frontages to provide more flexibility to accomodate non-retail uses?**
- c) If further flexibility is required, what approach should be adopted to maintain an appropriate balance between retail and non-retail activity in the primary and secondary shopping areas?**

## **Hierarchy of Centres**

Retail facilities are an important part of people's lives and an important sector of Thurrock's economy. Achieving the right balance of quality, quantity and distribution of retail facilities is therefore extremely important and the Local Plan will need to ensure that development proposals are appropriate to their location. There are a number of shopping centres in the Borough which vary in size and the range of shops and ancillary services they provide. The current hierarchy of shopping centres in Thurrock is defined under policy Policy CSTP7 – Network of Centres of the adopted Core Strategy and is set out in Figure 15 below. This is based on a range of criteria, including the size of the centre, the quantitative and qualitative range of retail and other uses present, together with its role in meeting the wider economic, civic, social and cultural needs of the Borough's residents and visitors.

**Figure 15: CSTP7 Hierarchy of Centres in Thurrock**

### **Regional Centre**

Lakeside

### **Town Centre**

Grays

### **Local Centres**

Corringham, Stanford-le-Hope, South Ockendon, Tilbury, Aveley, Sockets Heath

### **New Centres**

Purfeet, South Stifford

### **Existing Neighbourhood Centres**

*Larger neighbourhood parades* – Chadwell St Mary, Stifford Clays, East Tilbury, Corringham, Grays, Little Thurrock, Chafford Hundred, Tilbury.

*Smaller neighbourhood parades* – South Ockendon, Aveley, Grays, Tilbury, Linford, Stanford-le-Hope, Corringham, Purfleet

The NPPF requires that local plans should define a network and hierarchy of town centres and promote their long-term vitality and viability by allowing them to grow and change in a way that supports a diverse retail offer, provides customer choice, allows a suitable mix of uses (including housing) and reflects their distinctive characters. In doing so, it is important to note that the role of individual centres within the hierarchy is not static, and is subject to change over time, reflecting wider economic and social trends, as well as proposals for new housing growth and changing community needs. It is likely that the retail and service role of several of the Borough's Local Centres will need to be enhanced, given the scale of housing growth required to meet the Borough's future housing needs. In addition, consideration will need to be given to the need for the development of one or more new centres in addition to Purfleet. Such changes will need to be planned for and reflected in a revised hierarchy of centres, with additional sites and locations for new retail and other town centre uses of an appropriate scale allocated in the Local Plan

#### **QUESTION 29**

- a) Should the retail hierarchy for town centres and other shopping locations within Thurrock be revised to take into account both historical and future changes in their role including the need to plan for future housing growth?**
- b) Are there any other centres that should be included or should any be omitted?**

### **Town Centre Development**

Good shopping centres offer a wide range of quality shops and services. They encourage shoppers to visit and develop a loyalty to the centre and the services it provides. The shopping offer, and the customers it attracts, contributes to increasing the vitality and viability of the shopping centre. It is important that Thurrock's town/shopping centres serve the needs of their catchment areas and that the local plan seeks to increase the number of houses in and around Borough centres to boost trade and enhance their prosperity and vitality. Some centres in Thurrock may have the capacity to include additional retail floorspace due to the number of people and available expenditure in their catchment area. Alternatively, some centres may have more shops than can be sustained by available expenditure and may need to contract or diversify. The South Essex Retail and Leisure Study identifies the need/capacity for new provision within specific centres, having regard to forward growth and planned/emerging commitments within the district and wider sub-region. The new local plan provides an opportunity to review the level of provision in all centres across Thurrock and to develop a more be-spoke approach to maintaining their future viability and vitality.

The current policy approach relating to retail development, as set out in the Core Strategy, is to promote a sequential approach, whereby first preference should be for town centre sites, followed by edge-of-centre sites, district and local centres and only then out-of-town sites. This policy recognises the importance of town centres as locations for shopping, particularly for people without a car, and the importance of retailing as the dominant economic activity underpinning the social and economic life of town centres. It seeks to reinforce the role of existing centres as the foci of shopping activity by encouraging new retail development, redevelopment or refurbishment in these centres.

#### **QUESTION 30**

- a) What are your experiences of shopping in Thurrock? What centres do you visit and do they**

**offer a good range of shops and services? Are there any deficiencies?**

- b) Should any of the retail allocations and town centre boundaries identified in the adopted Core Strategy be amended in order to include areas/sites that would enable the centres to grow and accommodate retail or other town centre uses, including housing, or exclude areas that are no longer appropriate?**
- c) Should any new retail areas be identified for centres without such a designation?**

## **Other Town Centre Uses**

Town centres have historically been the location for a wide range of uses, in addition to retailing, such as theatres, museums, libraries, markets, gyms, health clubs, bingo halls, bowling alleys, cinemas, hotels and eating and drinking establishments. The range and level of facilities tends to vary with the size of the town centre and its accessibility by car and public transport. With the retail role of some town centres in decline, the importance of encouraging a wider range of uses and activities within town centres has increased in importance, both as a means of maintaining their wider economic and social function but also in ensuring that their physical and environmental fabric does not decline due to a lack of investment.

### **QUESTION 31**

- a) Are there any other facilities/activities which should be promoted or accommodated in particular town centres?**

## **Non-Retail Uses in Town Centres**

Current policy in the adopted Core Strategy aims to ensure that changes of use within the shopping frontages of town centres take place without undermining their retail function. The policy recognises that space in shopping frontages can usefully be taken up by non-retail uses. Such uses can add to the variety, attractiveness and economic activity of the centre, but only so long as they do not concentrate within primary frontages so that the retail character of the immediate area is not undermined and does not deter the movement of shoppers in a particular direction within the centre.

### **INFORMATION**

Thurrock Town Centre Health Check Assessment Report (2018) is available to view on the Council's Local Plan website. ([www.thurrock.gov.uk/localplan](http://www.thurrock.gov.uk/localplan)).

### **QUESTION 32**

- a) Do you have concerns about non-retail uses in shopping frontages or the over concentration of particular uses in those centres that you visit?**

## Hot Food Takeaways

While it is recognised that hot food takeaways offer a popular service to local communities and have a significant role to play within town centres and other shopping areas, an over concentration of them can be detrimental, affecting the retail character and function of shopping centres. Hot food takeaways can affect local amenity through an increased incidence of litter, smells, anti-social behaviour, noise disturbance, parking and traffic problems. It can also create an imbalance in food choices available to the local community i.e. in areas with high concentrations of hot food takeaways, they form a disproportionate amount of the local food offer. Clustering of hot food takeaways can create 'hotspots' which attract increased numbers of customers, particularly in the late evenings and can lead to problems with noise disturbance, littering and anti-social behaviour. These matters have direct and indirect effects on the health and well-being of the local community and can affect the vitality and viability of shopping centres.

Evidence shows that both obesity levels and access to unhealthy food is an issue which needs to be addressed nationally. Studies have shown that there is also a correlation between childhood obesity and deprivation; deprivation and higher proportions of takeaways, and levels of overweight/obesity and the number of takeaways.

The prevalence of hot food takeaways increases the temptation/likelihood of people, particularly children, purchasing such food on the way to/from school or during leisure trips. Evidence shows that minimising these opportunities has a beneficial effect on levels of obesity.

### QUESTION 33

- a) **Should there be restrictions on the number and distribution of hot food takeaways in town/shopping centres to avoid over-concentration and clustering?**
- b) **Should there be restrictions on hot food takeaways near to schools, youth facilities and parks?**

## Transport and Access

Planning policy at all levels promotes the idea of sustainable transport choices through the reduced need to travel by car and improving accessibility by public transport, walking and cycling. Through the process of preparing the Local Plan, there is an opportunity to identify proposals to carry out traffic management measures or public realm works that can improve traffic circulation and/or pedestrian movement. This could also include action to encourage more people to walk and cycle into town centres.

### QUESTION 34

- a) **Are there any traffic management measures or public realm works that are needed in particular town centres?**
- b) **Are there any pedestrian or cycle routes that are needed in particular town centres?**

## Car Parking

The Core Strategy seeks to influence the demand for travel and the new Local Plan will also need to maximise the use of sustainable modes of travel (public transport, walking and cycling), and reduce

the need to travel, by concentrating development in appropriate locations across the Borough's network of centres. Alongside this strategy, the Council will use various other measures/services to influence where and how people travel for shopping, leisure and other social activities. Car parking is an integral part of the town centre offer and its location, quality and management regime has a significant bearing on its attractiveness for shoppers, workers and visitors.

#### **QUESTION 35**

- a) Where could car parking be reduced?**
- b) Is there a need for additional car parking provision in any locations? If yes, please specify if it would be for shoppers, visitors or workers.**
- c) Where could long stay car parking spaces be transferred to short stay?**

## SECTION 7: DEVELOPMENT PRINCIPLES

### Designing active places

Over 70% of adults are overweight or obese in Thurrock, which is significantly higher than the national average. At the age of 5, children in Thurrock have a similar rate of obesity to the national average. Yet, by the age of 10 and 11, 23.9% of children are obese and 37.9% have excess weight (are either overweight or obese), which is significantly higher than the national and regional averages. The Council's Joint Strategic Needs Assessment on Whole Systems Obesity, which examines the reasons for high obesity levels in Thurrock, recommends that the Council seeks to embed active design principles in the emerging Local Plan.

In October 2015 Sport England supported by Public Health England launched an Active Design Guidance document to help support the creation of healthy places. The main principles outlined in the document are set out in figure 11. These principles are based on national urban design best practice and can be applied to many different types of development, including the enhancement of existing places.

**Figure 11 – Active Design Principles**

Activity for all

Walkable Communities

Connected walking and cycling routes

Co-locating of community facilities

Network of multifunctional open space

High quality streets and spaces

Appropriate infrastructure

Active buildings

Management, maintenance, monitoring and evaluation

#### QUESTION 36

**Should the Council seek to embed Sport England's Active Design Principles in the emerging Local Plan? Please reference supporting evidence where possible.**

## **Ensuring that the health impacts of new developments are appropriately assessed**

National policy recognises the need to understand and take account of the health status and needs of the local population, including expected changes and information about relevant barriers to improving health and well-being.

Health Impact Assessments assess the positive and negative effects of new development on local communities and/or individual population subgroups. Requiring a Health Impact Assessment for large and/or sensitive planning applications will ensure that site promoters and developers have properly considered the impact of the development on communities and on the delivery of positive public health outcomes. For developments that are already required to submit an Environmental Impact Assessment (EIA), it may make sense to integrate health impacts into the EIA as the methodology is similar and there is some overlap in the evidence gathered and used for both assessments.

### **QUESTION 37**

**Should the Council seek to require a Health Impact Assessment to be submitted as part of large and/or sensitive planning applications? Please reference supporting evidence where possible.**

## **Safeguarding local identity**

Promoting high quality design and supporting local character and distinctiveness are strong themes embodied in national policy. In planning how an area might change and develop over the next 20 years, it is important to consider the things that make that place unique and are truly valued by its communities.

### **Local green spaces**

Green infrastructure contributes to the quality and distinctiveness of the local environment. It creates opportunities for walking and physical activity and generally adds to quality of life. Green infrastructure is diverse in character and can include formal parks and gardens, informal grassed areas, linear paths, towpaths, sports pitches and other kinds of landscaped areas.

For many local communities, securing high quality green infrastructure in and around their neighbourhoods is important. National planning policy gives local communities the opportunity to nominate important Local Green Spaces for special protection in Local Plans. If a space is formally designated as a Local Green Space in the Local Plan, it would effectively give that space the same protection from development as a Green Belt site.

In July 2016, the Council invited communities to nominate Local Green Spaces in their area that they felt meet the following criteria:

- Geographically close to the community it serves;
- Special to that community because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife etc.;
- Local scale i.e. not an extensive tract of land.

This consultation only generated 34 responses. Therefore, the Council has decided to reopen the nomination process as part of this consultation.

#### **QUESTION 38**

**Are there any local green spaces in your area that you feel are special to your community? Please include information about the location of the space and the reason why you believe it should be allocated as a Local Green Space.**

#### **Local buildings of interest**

The historic environment has a powerful influence on people's quality of life in terms of promoting civic pride and a sense of local identity. Important local architectural, archaeological and landscape features such as the forts, the medieval parish churches and Bata village all highlight the area's unique history.

Local Lists identify historic buildings and features that are valued by the local community but are not currently subject to enhanced protection (i.e. Listed Building status). These buildings and features make a place special for local people and they represent an area's history, traditions, stories and memories.

In July 2016, the Council invited communities to nominate local buildings and features of interest to be included on a Local List. This consultation only generated 3 responses. Therefore, the Council has decided to reopen the nomination process as part of this consultation.

To help us identify the buildings and features that are important in the Borough we need you to nominate buildings and historic features in your area that you think have architectural, historical and social significance. Once we have received all of the nominations, a panel of experts will review the nominations and determine which buildings and features should be included in the Local List.

#### **QUESTION 39**

**Are there any local buildings or features in your area that you feel are of architectural, historical and/or social significance? Please include information about the location of the building/feature and the reason why you believe it should be included on the Local List.**