

Draft Thurrock Local Plan Issues & Options (Stage 2)

DECEMBER 2018

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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 XXXX, with the consultation period closing at 5pm on XXXX 2019. 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. 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.

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.

How the Local Plan is progressed will be guided and underpinned by need to deliver against the following principles:

1. Delivering the right infrastructure in the right place and at the right time
2. Positive health and wellbeing impact
3. Meeting Thurrock's housing needs
4. Protect and enhance the character of existing communities
5. Minimising carbon emissions
6. Maintain an effective green belt
7. Protecting and delivering quality in the built environment
8. Meeting employment needs
9. Ensuring our town centres continue to thrive
10. Respecting the River Thames
11. Managing waste

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.

In July 2018, the Association of South Essex Local Authorities (ASELA) produced a Statement of Common Ground (SoCG) which has been signed and formally agreed by the constituent authorities (Basildon, Brentwood, Castle Point, Rochford, Southend-on-Sea, and Thurrock). The SoCG sets out ASELA's intention to prepare a 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 of new housing, employment, retail and town centre development across South Essex, together with supporting infrastructure priorities over the plan period to 2038.

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 2020) 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 independent planning 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 2022. 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.

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

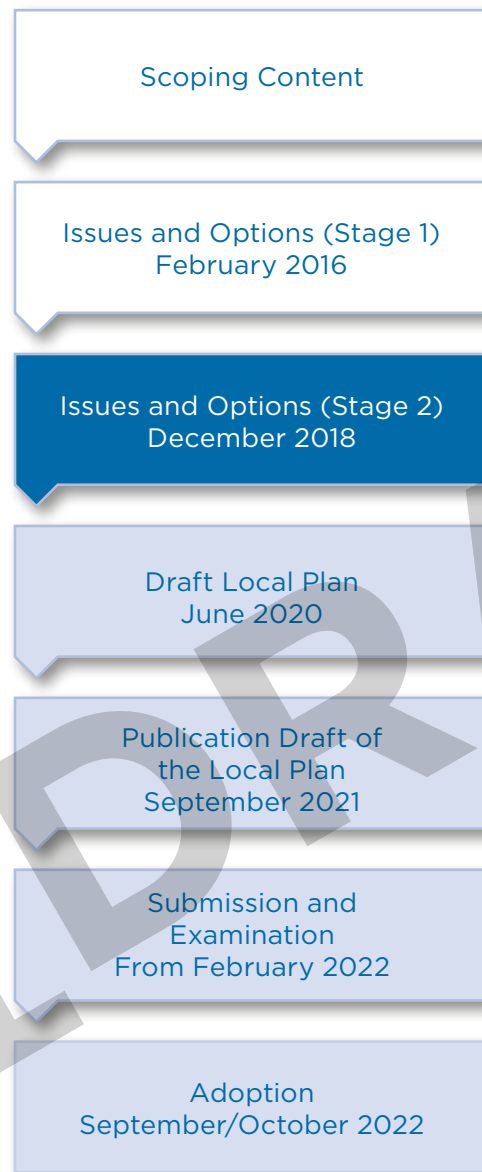


Figure 1: Local Plan Stages of Preparation

How will communities & 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 has prepared an updated Statement of Community Involvement (SCI) which sets 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.

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.

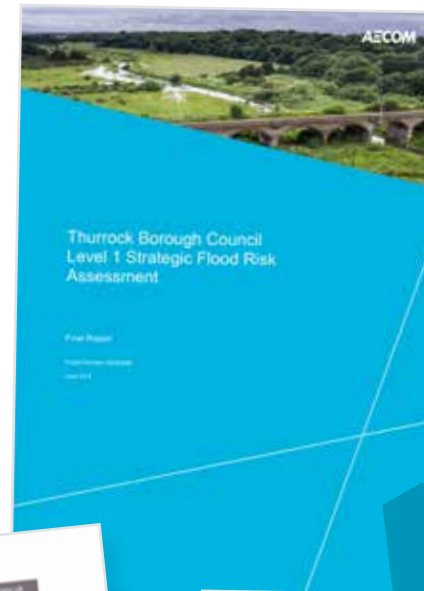
Further information on how some of the emerging studies and their findings and conclusions are already helping to shape the plan-making process is described in more detail in the following sections of the Consultation Document. If you would like to read or obtain a copy of these technical studies and reports they can be found on the Council's Local Plan website: www.thurrock.gov.uk/localplan.

Technical studies completed/commissioned include:

- South Essex Strategic Housing Market Assessment 2016
- South Essex Strategic Housing Market Assessment Addendum Report 2017
- Thurrock Housing Land Availability Report 2017
- Thurrock Green Belt Stage 1 Assessment 2018
- 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 Strategic Flood Risk Assessment Update 2018
- Grays Town Centre Area Development Framework Update
- Thurrock Integrated Landscape Character Assessment and Sensitivity Evaluation 2018
- Integrated Sustainability Appraisal 2018
- Lakeside Area Development Framework Update
- Thurrock Transport and Infrastructure Baseline Study
- Thurrock Vision for Movement

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?



Land Availability Assessment

A starting point for identifying a development strategy and locations for growth is to look at the potential availability of land for development.

Therefore, 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 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' exercises 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 will be assessed through the plan-making process and considered for allocation in the emerging Local Plan.

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).



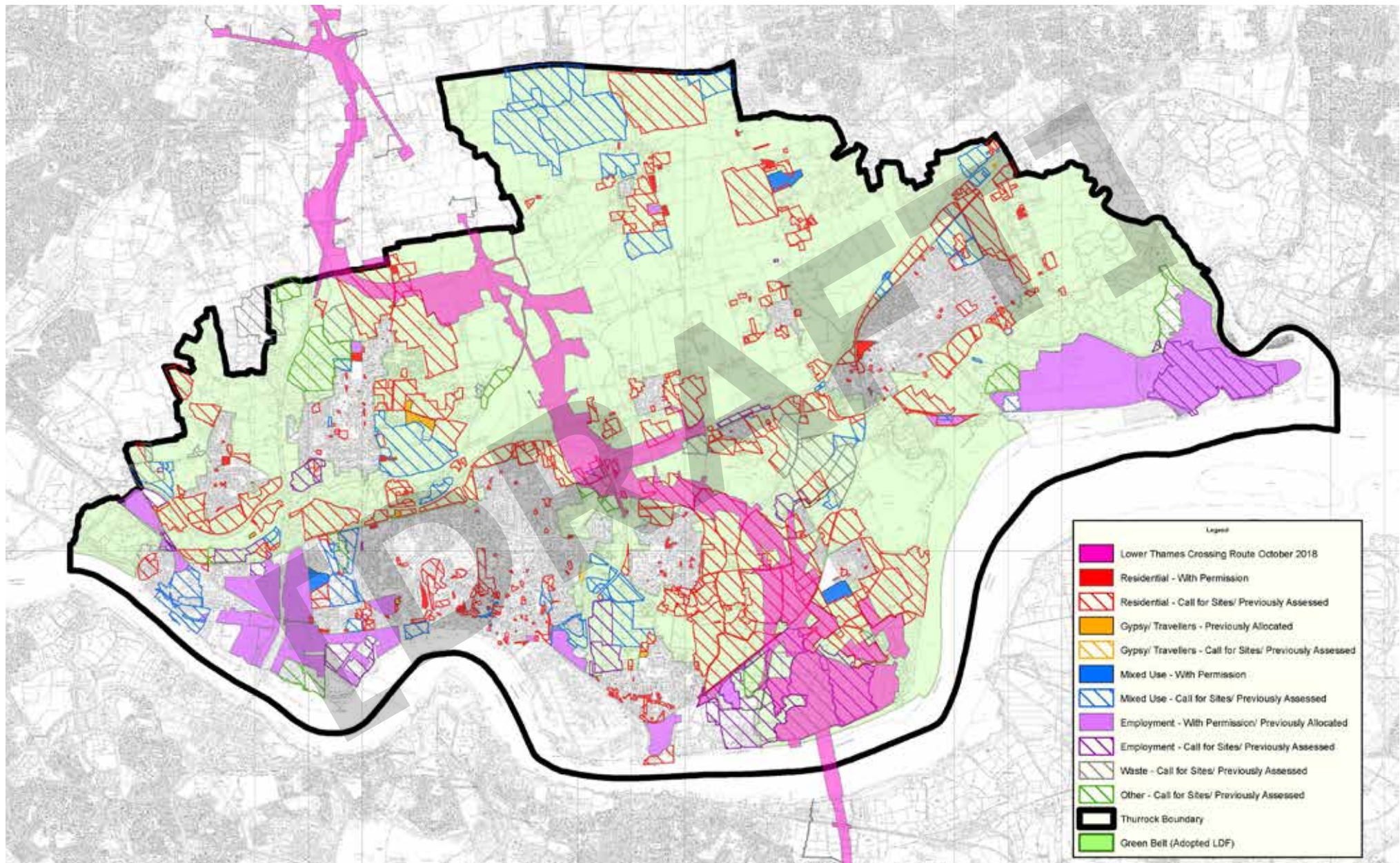


Figure 2: Call for Sites Map

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 Cooperate 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.

- 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
- Health and Wellbeing
- 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 other key strategic issues the Council will need to consider and address with stakeholders and partners.

Figure 3: Cross Boundary Issues

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 (Essex, 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 was 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.

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.

The 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 4).

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.

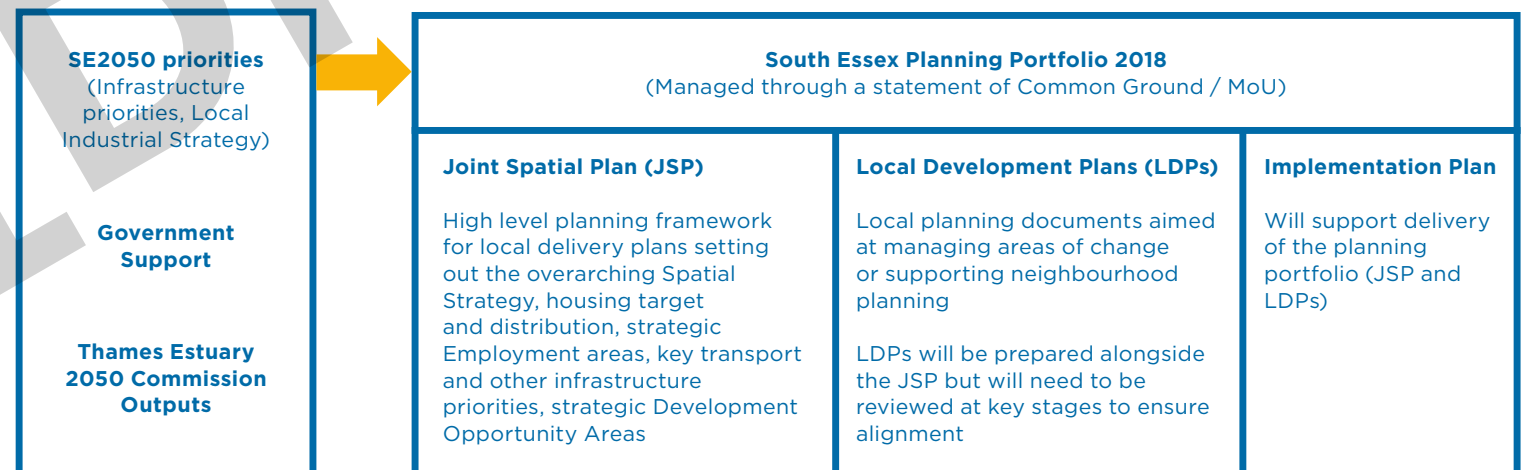


Figure 4: The South Essex Local Plan Portfolio

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 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.

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 LDS 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 5 sets out the proposed suite of DPDs and SPDs which it is proposed to prepare for Thurrock.

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.

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).

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

The Council adopted the 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), the Council identified a number of policies in the Core Strategy which required updating to ensure that they were in full conformity with the NPPF. These policies were adopted 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.

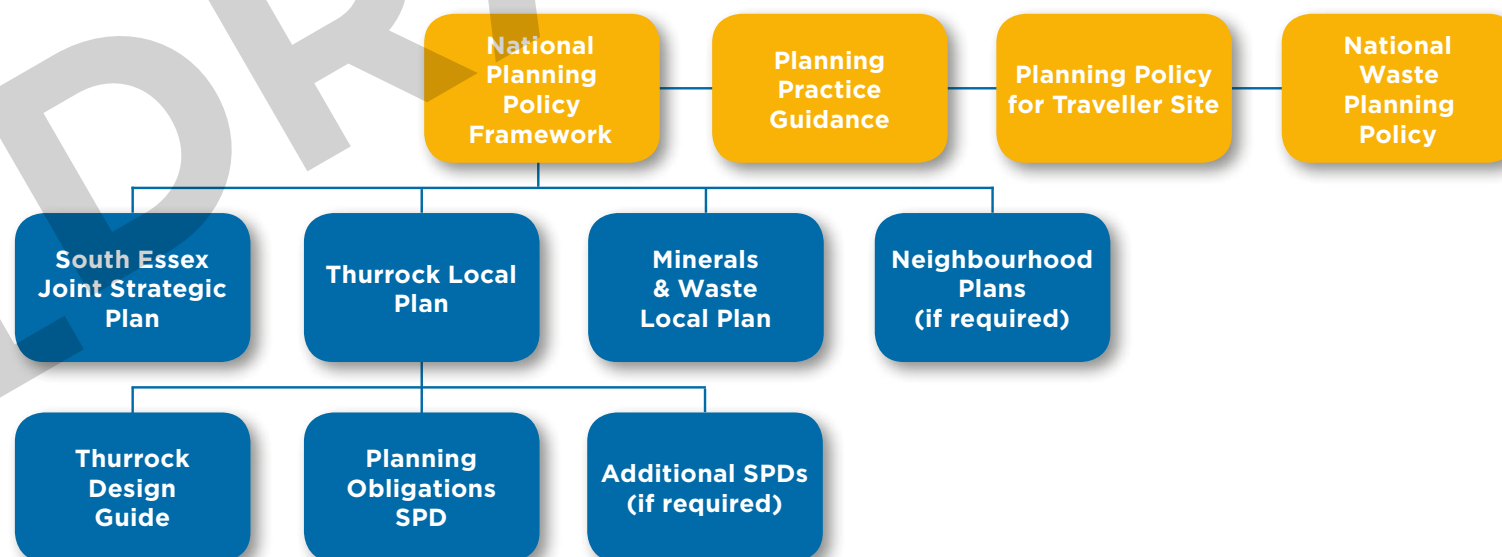


Figure 5: Proposed Thurrock LDS Development Plan and Supplementary Planning Documents

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.

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.

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.



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 updated elements of the scoping report which are presented in the SA of the Plan. In addition to the requirement to undertake an SA 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 internationally designated sites for nature conservation (or ‘European sites’).

Thurrock Council recognises that any Local Plan, which would see an increase in the borough’s population by as much as 40,000, must prioritise limiting any associated rise in air pollution.

Thurrock’s Local Plan will set out clear and precise plans to alleviate the resulting impact on Thurrock’s residents from all pollutants including but not limited to:

- sulphur oxides
- carbon monoxide
- nitrogen oxides
- volatile organic compounds
- particulates
- persistent free radicals
- toxic metals
- chlorofluorocarbons
- ammonia
- odours

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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).

The Council also intends to set up an external Integrated Sustainability Assessment Stakeholder Reference Group to facilitate the wider involvement of prescribed Duty to Cooperate 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 the Council doesn'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 NPPF 2018 introduces a Housing Delivery Test which will measure a Council's performance of delivery of housing over a three year period. Where delivery falls below 95%, the council will be required to introduce an action plan to assess the causes of under-delivery and identify actions to increase delivery in future years. Where housing delivery falls below 75%, the presumption in favour of sustainable development will be triggered, rendering policies in the Local Plan as being out of date. This could potentially make it easier for developers to get planning permission for housing development on appeal to the Secretary of State, resulting in sporadic development across the Borough (possibly in the Green Belt) and a failure to maximise the benefits that future housing could bring to the local community. Failure of the Council to produce a Local Plan that allocates land for development will result in a drop in housing delivery against established targets and the likelihood of sanction under the housing delivery test.

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.

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).

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

Comments from Duty to Cooperate bodies

The Local Plan must:

- Consider through the Duty to Cooperate process the need for Thurrock to contribute towards meeting any unmet future housing needs from other authorities, including London and Southend in particular;
- Ensure that residential developments are supported by health facilities, in order to combat existing health inequalities experienced at a local level;
- Consider the requirement for Thurrock to make additional provision to meet Basildon's unmet Gypsy and Traveller needs;
- 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 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.

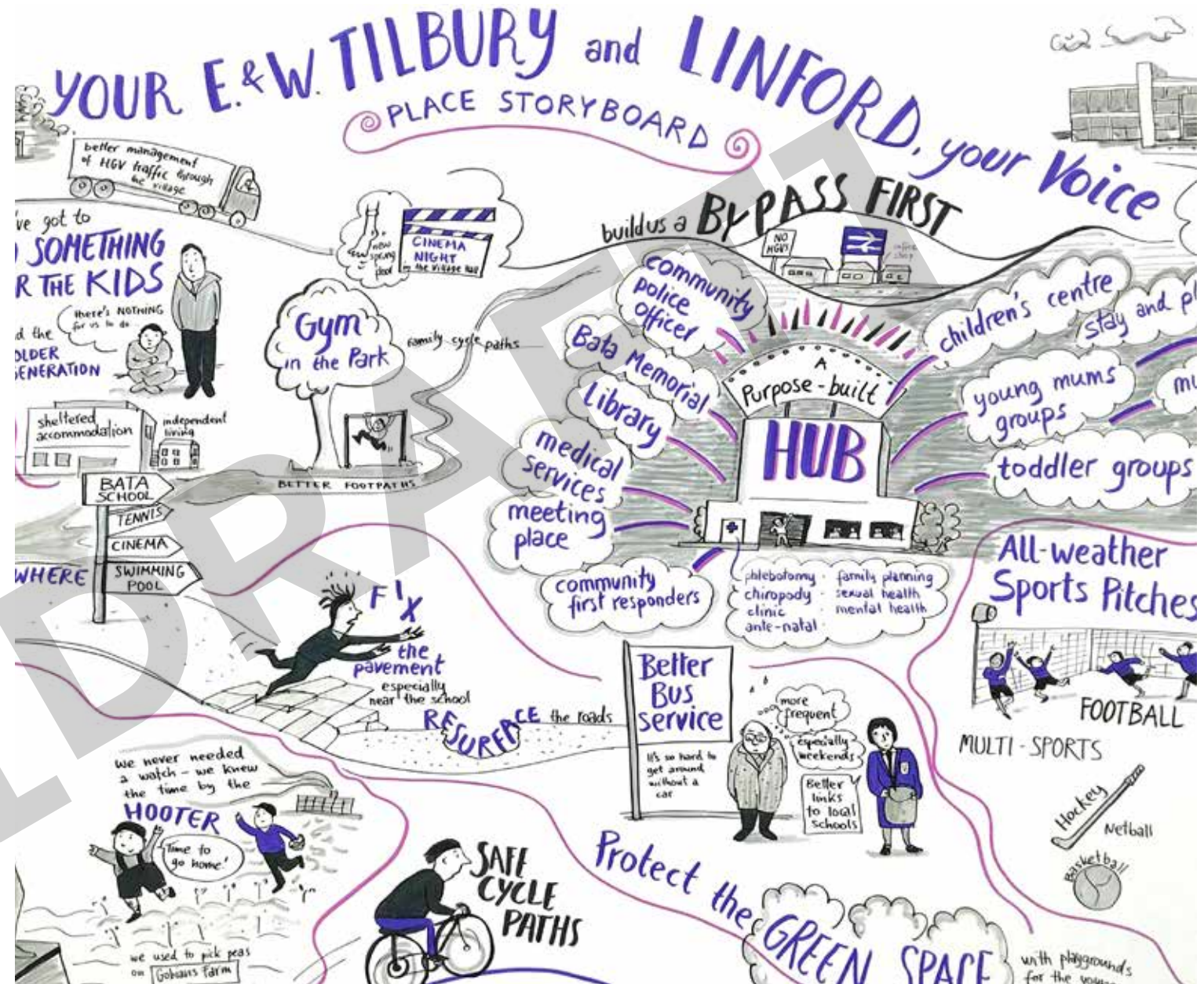
Your Place, Your Voice Community Planning Events

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.



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 6 sets out the emerging key issues and challenges facing Thurrock.



- 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?

Figure 6: Draft Key Issues and Challenges

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.

community which is proud of its heritage and excited by its diverse opportunities and future.

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

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



Figure 7: Corporate Vision

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 and affordable 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 the 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.

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.

1. Delivering the right infrastructure, in the right place and at the right time

The delivery of new infrastructure to meet the needs of the local community and business is crucial to the development of Thurrock as an economically prosperous, attractive and healthy Borough. Following active engagement with local communities to identify the full range of new infrastructure necessary to support planned growth - such as hospital services, the Council will prepare an Infrastructure Delivery Plan (IDP) which will set out the funding and implementation mechanisms needed to secure their delivery. In preparing the IDP the Council will work closely with Government, infrastructure providers and the development industry to align investment priorities and strategies to ensure, where possible, the up-front provision of key strategic transport and community infrastructure.

2. Positive Health and Well Being Impact

Promoting and enhancing community health and well-being is an important 'golden thread' which will run throughout the Local Plan. The planning system can play a key role in creating healthy and inclusive communities and the local plan will

need to set out an integrated policy framework which not only delivers the homes and community facilities to meet local needs but also creates safe, accessible and healthy environments for people to live in, free from the adverse impacts of poor air quality. Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities and the Local Plan will set out a policy framework for the delivery of new open spaces and sports and leisure facilities as part of the master planning and regeneration of both existing and new communities.

3. Meeting Thurrock's Housing Needs

The provision of high quality and affordable housing, in particular low cost housing, which meets the needs of all sections of the community is a key policy outcome for the Local Plan. Policies will identify the scale and distribution of new housing development together with the necessary supporting community and other infrastructure to ensure the development of balanced and inclusive communities. In particular, it is considered that there should be a particular emphasis on accelerating and increasing the delivery of a wide range of affordable housing products including new Council housing together with specialist housing, to meet the needs of those on low incomes and the elderly.

4. Protect and enhance the character of existing communities

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 investment in new homes, while protecting and enhancing the character of existing communities and help fund the regeneration of existing centres, without the overdevelopment of existing settlements which will fundamentally alter their character.

5. Minimising Carbon Emissions

Policies will seek to minimise carbon dioxide emissions from new development - with the aspiration of being as carbon neutral as possible - contribute to the 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.



6. Maintaining an effective Green Belt

Thurrock's Local Plan will prioritise building on all viable brownfield sites. In order to meet Government policy objectives and to ensure everyone has access to a decent and affordable home, the Council will have to consider releasing land from the Green Belt to accommodate the number of homes and supporting community facilities required in Thurrock over the plan period. 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. The Local Plan will investigate:

- (a) All greenbelt sites which have the potential to be improved to provide much greater social and environmental value to the Borough.
- (b) All brownfield sites which have the ability to be re-designated as green belt as part of a development proposal

7. Protecting and Delivering Quality in the Built Environment

All new development will be required to meet high design standards and improve the overall quality of Thurrock as a place to live and work. Consistent with national planning policy, the Local Plan together with the preparation of Master Plans and supporting Design Guides will provide developers with comprehensive guidance on how to plan for the delivery of high quality design which incorporates 'garden community' principles whatever the scale or type of development being considered.

8. Meeting Employment Needs

Policies will need to recognise the aspirations of the major businesses in the Borough to develop and expand while also ensuring that development occurs in the right locations to protect and enhance the attractiveness of the Borough and make the best use of both existing and planned investment in new infrastructure. Policy will also need to ensure the delivery of sufficient housing to meet the needs of workers and the availability of an educated and skilled workforce to ensure the benefits of ongoing job creation and economic growth are accessible to all.

9. Ensuring 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 and 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 communities. Where appropriate, Inset Plans will set out more detailed planning, design and infrastructure related policies to guide the future development of individual Borough centres.

10. The River Thames

Thurrock's character and history is interwoven with that of the River Thames. In economic terms, the Ports 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 the wider and unique riverscape which hosts important heritage assets which contribute to Thurrock's identity and sense of place. The Local Plan will need to continue to recognise and exploit the economic opportunities arising from Thurrock's location by the river while also respecting the need to protect and enhance the distinctive riverscape, heritage assets and unique biodiversity and ecology.

11. 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 or areas of search identified for the extraction of sand and gravel and other mineral infrastructure. Although these matters will be addressed in a separate Minerals and Waste Local Plan, it will remain important that the spatial strategy set out in the Local Plan does not prejudice the ability of the Borough to meet its future minerals and waste needs.

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, Thurrock 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.

The scheme as proposed in October 2018 sets out that the LTC will consist of approximately 23km of new roads connecting the tunnel to the existing road network, with two 4km tunnels to enable traffic to cross beneath the river. The new road scheme is proposed to be three lanes in both directions, with widening of the M2/A2 and the M25 at each end of the route.

An indicative plan of the proposed alignment of the Lower Thames Crossing is shown on Figure 8.

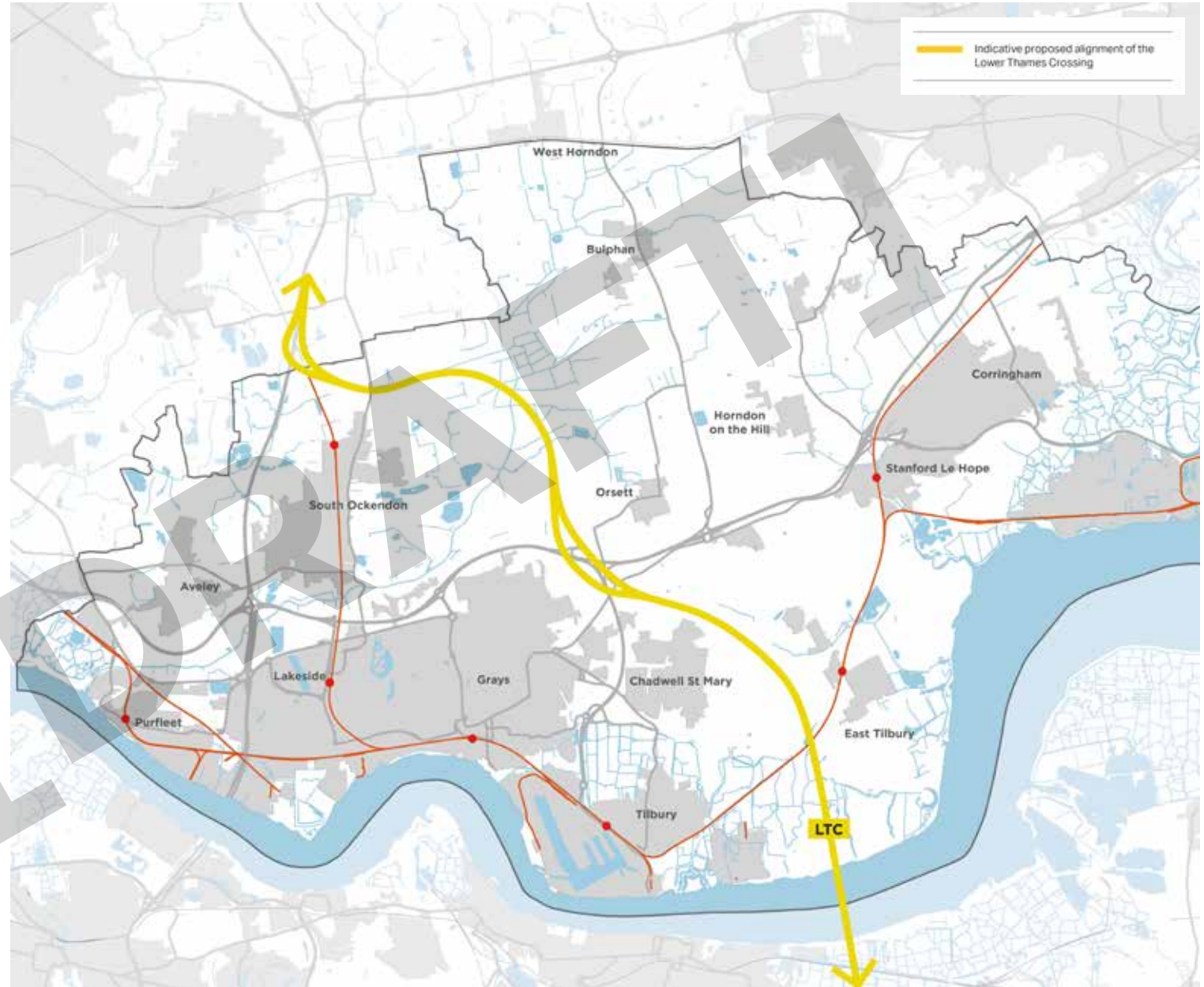


Figure 8: Indicative Plan of the proposed alignment of the Lower Thames Crossing

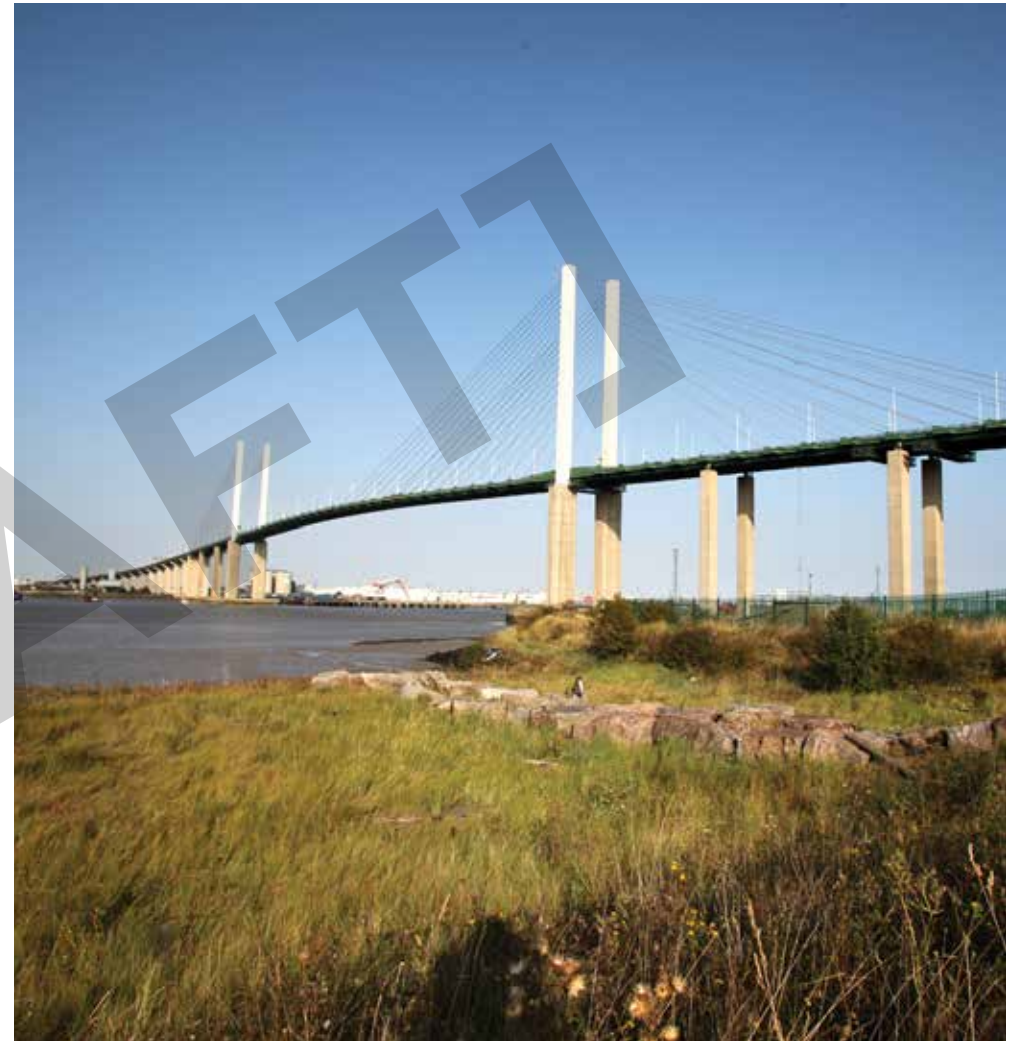
The Lower Thames Crossing is expected to open by 2027, subject to the necessary funding and planning approvals.

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. Following the abolition of the East of England Regional Spatial Strategy in 2013 (which set out housing targets for its constituent local authorities), the Council has the responsibility for identifying the housing 'target' in its Local Plan, but this target must be based on sound evidence and discussed with neighbouring local authorities under the Duty to Cooperate process.

Over the past few years, Thurrock has worked closely with neighbouring local authorities in South Essex to prepare technical evidence (the Strategic Housing Market Assessment (SHMA)) that identified an 'objective assessment of housing need', taking into account population and household projections, affordable housing needs and bespoke economic growth projections. However, the recently published NPPF (July 2018) sets out a requirement for a standardised methodology to be used to assess future housing needs, as the Government believes that this will provide a more transparent and consistent basis for Local Plan production across the country.

The standard method is set out in national planning practice guidance (NPPG) and is a simple calculation which uses the most recent national household projections and the most recent median workplace-based affordability ratios to calculate a minimum annual local housing need figure for each local authority area. 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 planning process and the views of the local community are used to inform the preparation of the JSP. 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

National planning policy states that local plans should 'positively seek opportunities to meet the development needs of their area' and that planning policies should ensure that a local authorities objectively assessed housing need calculated using the standard method should be met unless there is a strong reason for restricting the overall scale of development in an area or if the adverse impacts of development would significantly and demonstrably outweigh the benefits.

As such, the starting point for preparing the Local Plan is the assessment of housing need calculated using the standard method. As stated above, the standard method is a calculation which uses the most recent national household projections and the most recent median workplace-based affordability ratios to calculate a local authority areas' minimum annual local housing need figure. The most recent data consists of 2016-based household projections and the 2017 affordability ratio and ordinarily, it would be expected that these datasets would be used to calculate Thurrock's minimum housing need. However, following the release of the 2016-based household projections in September 2018, the latest assessment of housing need, at both a local and national level, indicates the need for a lower level of housing than that forecast by the previous (2014-based) set of projections. Therefore the Government have published a consultation to seek views on changing the standard method calculation outlined in the NPPF and NPPG to ensure that the starting point in the plan-making process continues to be consistent with ensuring that 300,000 homes per year are built across the country by the mid 2020's.

The Government's proposed approach outlined in the consultation document is for the 2014-based household projections to be used as the demographic baseline for assessment of local housing need, rather than the more recently published 2016-based projections. The Government also proposes to review the standard methodology formula with a view to establishing a new method by the time that the next set of projections are published (the 2018-based household projections which are due to be published in 2020).

The implication of any further adjustment to the standard method on the calculation of Thurrock's future housing need is unclear at the present time. However, it is clear that through the course of the plan-making process the minimum number of homes to be planned for will fluctuate as updated household projections and affordability data are released. It will therefore be necessary for the development strategy and policies in the Local Plan to be sufficiently flexible to adapt to changes in the forecast of local housing need.

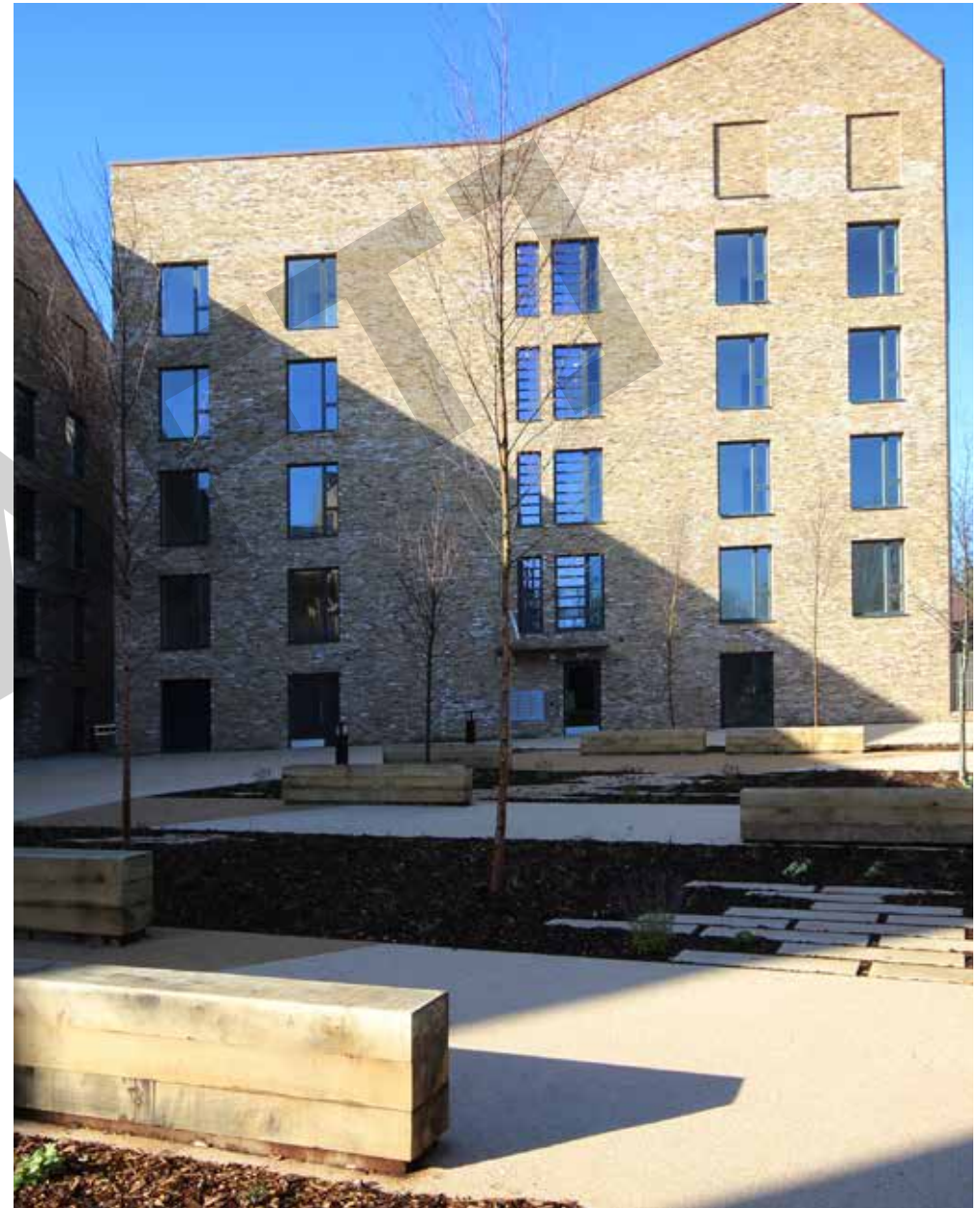
The standard method calculation (using 2014 based household projections and the 2017 affordability ratio) identifies a need for 1,173 homes per year in Thurrock. It should be noted that unlike the assessment of housing need calculated in the SHMA 2017, the standard methodology fails to consider whether any adjustments need to be made to the housing requirement 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 it will be necessary, through ongoing work on the Local Plan, to carry out additional technical work to assess the implications of using the standard method to calculate housing need on the economic growth of the Borough.

The Council could make a decision to apply an uplift to the housing need figure calculated using the standard method to ensure that the economic growth ambitions of the Borough are achieved in a sustainable manner. Without an adequate supply of housing to meet workers needs locally, there is the potential that firms could relocate or redirect investment to other locations as workforce availability declines. Alternatively, if job growth were to continue without the required housing growth, increased levels of in-commuting are likely to result, putting additional strain on the local transport networks. The level of any additional adjustment to support the economic growth of the borough would need to be determined through further technical work.

Setting a housing target lower than the objectively assessed housing need calculated using the standard method would require the Council to approach neighbouring authorities through the Duty to Cooperate process and through the preparation of the JSP to see if they are able to accommodate all or part of Thurrock’s unmet housing need. Initial discussions with neighbouring local authorities indicate that, at present, this is unlikely to be the case.

Figure 9: Breakdown of Thurrock’s objectively assessed housing need figure calculated using standard method

Stage	Adjustment	Number of dwellings per annum
Starting point: 2014 household projections 2016-2026 (Source: Office for National Statistics (ONS))		853
Affordability 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.	+320	1,173





Strategic Housing Market Assessment (SHMA)

Whilst the NPPF no longer requires local authorities to prepare a SHMA, it is considered to be a useful piece of up-to-date technical evidence against which to benchmark the assessment of housing need calculated using the standard method. The NPPG also states that a higher housing need figure may need to be considered where a recent assessment of need, such as a SHMA, indicates a higher level of need than that proposed by the standard method calculation.

In May 2017, the South Essex Authorities published an update to the South Essex 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. However, the lower figure did not take account of the projected rate of economic growth in the Borough over the plan period and therefore the higher figure was considered to be a more realistic reflection of the future housing need in Thurrock..

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.

QUESTION 7:

To ensure that enough homes are provided in Thurrock over the plan period, which approach should the Plan look to adopt? Are there any other options that should be considered? Please explain your answer and reference supporting evidence to justify your response

Approach A - Set a housing target that mirrors our objectively assessed housing need calculated using the standard method

Seek to allocate enough land to meet Thurrock's objectively assessed housing need calculated using the Government's standard method over the Plan period

Approach B - Set a housing target higher than Thurrock's objectively assessed housing need calculated using the standard method to support increased economic growth in the borough

Seek to allocate enough land to meet Thurrock's objectively assessed housing need calculated using the Government's standard method over the Plan period with an additional uplift to the housing target to support economic growth in the borough.

Planning for affordable housing

Affordable housing is housing for sale or rent, which is provided to eligible households whose housing needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is essential for local workers). There are a number of different types of tenure within the range of affordable housing with the most common being social rented, affordable rented and intermediate housing.

Thurrock has a significant need for more affordable housing across all tenures. This need was calculated in the 2016 South Essex Strategic Housing Market Assessment (SHMA) and was updated in May 2017 in response to updated demographic projections. The net annual affordable housing need for the next five years was calculated as 472 homes per year, rising to 663 homes per year for the remainder of the plan period. If the identified annual requirement for affordable housing were to be applied to the overall annual housing need, it would mean that 48% of the total number of new homes built would need to be affordable housing. It should be noted that further technical work will need to be carried out to determine an up-to-date assessment of affordable housing need following the introduction of the standard method of calculating overall housing need and to take account of changes to the definition of affordable housing contained within the NPPF.

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-making. 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 requirements 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 under current policy cannot be met on site without impacting the viability, and therefore delivery, 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.

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The 2017 Local Plan Viability Study Baseline Report is available to view on the Council's website 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:

To help maximise the amount of affordable housing delivered over the plan period, which approach to setting an affordable housing target should the Plan look to adopt? Are there other options that should be considered? Please reference supporting evidence where possible.

Approach A – Borough Wide Affordable Housing Target

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

Approach B – Split Affordable Housing Target

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

Approach C – Site Specific Affordable Housing Target

Set a site specific affordable housing target for allocated sites having regard to the individual circumstances of each site with regard to the provision of key infrastructure improvements and overall development viability.

Affordable Housing Tenures

Effective affordable housing provision is not just about quantity; of equal importance is ensuring the right type of provision. The SHMA 2016 identifies the greatest need for affordable housing is from those requiring housing from the affordable housing for rent tenure. However, the NPPF sets out that planning policies should expect at least 10% of homes on major development sites to be available for affordable home ownership. This requirement would form part of the overall affordable housing contribution from a development site which would have implications on the amount of affordable rented homes that could be delivered on any given housing site.

Therefore, it should be noted that further technical work will need to be carried out to establish the affordable housing needs of specific groups and to identify how the housing needs of these different groups can be met within a policy framework which promotes the tenure of affordable home ownership over other types of affordable housing tenure.

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INFORMATION ON AFFORDABLE HOUSING

Affordable Housing is housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

- a) Affordable housing for rent: housing where the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents.
- b) Starter homes: new homes offered to younger people (under 40) at a minimum 20% discount to the market price, with the discounted price no more than £250,000.
- c) Discounted market sales housing: housing that is sold at a discount of at least 20% below local market value.
- d) Other affordable routes to home ownership: this is housing that is provided for sale that provides a route to ownership for those who could not achieve home ownership through the open market. It includes shared ownership (allows purchasers to typically buy between 25-75% of the equity of a property, relevant equity loans, other low cost homes for sale (at least 20% below local market value) and rent to buy (which includes a period of intermediate rent).

QUESTION 9:

What approach should the Council take to addressing the need for the various tenures of affordable housing? Are there other options that should be considered? Please reference supporting evidence where possible.

Approach A - Prioritise the delivery of social rented housing units

This approach would deliver more homes that are genuinely affordable to more households and particularly those most in housing need. However, following this approach may reduce the total number of affordable homes delivered over the Plan period due to reduced development viability.

Approach B - Prioritise the delivery of intermediate housing units (i.e. shared ownership, starter homes)

This approach meets the Government's objective of increasing home ownership rates by offering an affordable route to home ownership for first-time buyers and households with lower incomes.

Approach C - Allow the tenure mix to be negotiated by the Council on a site by site basis

This approach would allow the tenure mix to be negotiated through the plan making and planning application processes, taking account of the Council's most up to date evidence on housing need.

Delivery of Affordable Housing

The Council secures the majority of affordable housing that is built in the borough by requiring developers to provide affordable dwellings as part of open market housing developments (through Section 106 Agreements). Affordable housing is also delivered directly by the Council or other Registered Providers (i.e. housing associations) on sites owned and/or developed by them.

The Government has recently announced plans to allow Councils to borrow more money to enable them to directly provide additional affordable homes in their area. The Council could also take responsibility for the direct provision of affordable housing by requiring developers to provide land and S106 financial contributions to the Council rather than the developer directly making provision for affordable housing on development sites. It should be noted that this approach will not necessarily increase the supply of affordable housing; it simply changes the delivery approach and subsequent ownership and management of the affordable housing units.

QUESTION 10:

Should the Council seek to increase the supply of affordable housing in the Borough by borrowing more money to build new homes?

What other approaches could the Council take to increase direct provision of affordable housing in the Borough?

DRAFT

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.

To date, these needs have been considered on a sub-regional basis through the 2016 South Essex SHMA as Thurrock is part of the South Essex housing market area. This assessment notes that the housing needs of older people in particular need to be carefully planned for. Again, this assessment will need to be updated to inform both the JSP and the Local Plan, following the recent publication of the updated NPPF. However, it is considered that the assessment included in the SHMA still provides a relevant context to aid discussion and understanding of how the housing needs of specific groups could be met.

Housing Mix and Size

National policy highlights the importance of considering the size and type of housing required once an overall housing target 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 11 sets out the types of housing required in Thurrock over the plan period. It should be noted that the figures contained in this table reflect the housing need figure identified in the SHMA (1,173 homes per annum) rather than the figure identified through the calculation of housing need using the standard method. However, it is anticipated that whilst the actual figures in the table will change following an update to the assessment, the proportion of homes required across each housing type is unlikely to be significantly different.

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 11:

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

Figure 11 - Suggested Housing Mix

Overall Housing Need	1,173 (per annum)
Detached	
3 bed or less	7%
4 bed	4%
5 bed or more	1%
Semi-detached	
2 bed or less	9%
3 bed	23%
4 bed or more	4%
Terraced	
2 bed or less	9%
3 bed or more	22%
Flat	
1 bed	11%
2 bed or more	10%

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.

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 and vulnerable groups is moving towards more flexible forms of living and support, which seek to maintain people's independence; for example, a self-contained home (C3 Use Class) within a site offering extra support 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 of the country, Thurrock has an ageing population and an increase in all types of accommodation options for older people will be needed over the plan period. The SHMA (2017) identifies that the population of Thurrock residents aged 75 and over will increase by approximately 9,300 over the period 2014 - 2037. The SHMA estimates that the additional demand for different types of specialist accommodation (within the C3 Use Class) generated by this population growth is for around 1,500 units, approximately 65 specialist accommodation units per year. In addition, the study estimates that the growth in the population living in communal establishments (C2 Use Class) will be approximately 450 persons over the plan period, requiring the provision of an average of 20 additional bed-spaces of C2 provision per year.

In addition to the provision of housing that meets the needs of older people, the provision of appropriate housing for people living with disabilities and other vulnerable groups is crucial in ensuring that they live safe and independent lives. The NPPF defines people as having a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. These persons include, but are not limited to, people with ambulatory difficulties, blindness, learning difficulties, autism and mental health needs.

Other vulnerable groups that may benefit from specialist or supported housing provision include young people leaving care, young single mothers, people fleeing domestic violence, people suffering from addiction problems and ex-offenders. Some people that fall into these groupings may require on-going support and care in permanent supported housing accommodation whilst others may need tailored support for a limited period in order to support them in to

more independent living and a settled lifestyle, with access to education, training and employment.

It should be noted that the delivery of specialist housing for older people, people with disabilities and vulnerable people is not simply a planning issue. The delivery of supported housing of all types requires effective joint working between multiple agencies, eg. housing, health and voluntary sector, as well as planning.

QUESTION 12:

To help better plan for the needs of older people and those with specialist housing 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'. This will ensure that all new general needs housing is suitable to meet the needs of an older person, a person with disabilities or a vulnerable person.

Approach B: 10% of New Dwellings 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'. This will ensure that sufficient homes are available to meet the housing needs of older and/or disabled residents.

Approach C: Allocate Sites for the provision of Specialist Housing

Allocate specific sites for the provision of specialist housing (both C2 and C3 Use Classes) to meet the needs of older people, people with disabilities, and vulnerable people.

Approach D: Requirement for Large Residential Developments to provide a specific amount of Specialist Housing

Set a specific target/requirement for the provision of specialist housing (C3 Use Class) suitable for the needs of older people, people with disabilities, and vulnerable people on large residential development sites.

Self -Build and Custom build housing

Self-Build or Custom Build housing is housing built or commissioned by individuals (or groups of individuals) to be occupied by themselves as their sole or main residence. For the purposes of planning policy, self-build and custom build dwellings share the same definition and the terms are used interchangeably. Self-build is where a person is directly involved in organizing and constructing their home, whereas custom build is where a person commissions a specialist developer to help to deliver their own home. Both routes require significant input from the home owner in the design process of the dwelling.

The Self-Build and Custom Housebuilding Act 2015 places a duty on local authorities to keep and have regard to a register of people who are interested in self-build or custom build projects in their area. In addition, local authorities are required to grant sufficient suitable development permissions on serviced plots of land to meet the demand, as evidenced by the number of people on the register, for self-build and custom build plots in their area. There are currently 63 individuals on this register. Whilst it is appreciated that this represents a relatively small proportion of the Borough's housing need, the requirement to meet this need is something to be considered through the Local Plan process.

QUESTION 13:

To meet the demand for serviced plots of land for self-build or custom build housing, which approach should the Council look to adopt?

Approach A: Allocate specific sites for the development of self-build/custom build housing. Please suggest specific sites if appropriate.

Approach B: Set a requirement for Large Residential Development sites to supply a proportion of serviced dwelling plots for sale to self-builders

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

Local Planning authorities must assess the need for Gypsies and Travellers and Travelling Showpeople accommodation in their areas and, if a need is identified, look for sites to provide for that need.

The Council is still in the process of finalising the assessment of need for Gypsies and Travellers and Travelling Showpeople accommodation to conform with national policy. However, once the full need is identified, the Council will consider how, and in what locations, it can seek to meet the identified need through the plan-making process. Therefore, whilst the Call for Sites 2018 has now closed, the Council would welcome any submissions of sites that may be suitable for use by Gypsies, Travellers and Travelling Showpeople as permanent or transit sites through the consultation process.

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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 10 Indicative Trajectory (Base date October 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 permission	-	2,072	1,250	3,322
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 2,850 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 Draft Interim Housing Land Availability Assessment Report will be available to view at the Council's Local Plan website. (www.thurrock.gov.uk/localplan)

Meeting Objectively Assessed Needs

As set out at the beginning of Section 4, there is a degree of uncertainty surrounding the calculation of Thurrock's objectively assessed housing need due to the current Government consultation on adjusting the standard methodology.

If the Government's proposed changes are implemented, the current calculation of housing need for Thurrock is for 1,173 new homes a year. This calculation has a base date of 2018 and so therefore, if this figure is projected forward to the end of the plan period, would result in a minimum housing need of 22,287 new homes between 2018 - 2037. This compares to an OAN of 1,173 dwellings a year identified through the SHMA 2017 and a total housing need of 31,763 new homes between 2014 - 2037. It must be stressed that these assessments of need cannot be directly compared as they have different base dates and the standard method calculation identifies housing need for a 19 year period, whereas the SHMA identified housing need over a 23 year period.

Notwithstanding this, 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 calculated using either method. 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 Spring 2019. 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.



Figure 11: Map of Green Belt

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 Thurrock.

The National Planning Policy Framework (NPPF) states, in paragraph 133, 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;
- To prevent neighbouring towns from merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

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 biodiversity; or to improve damaged and derelict land.

Paragraph 135 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;
- Demonstrate the necessity for the Green Belt and its consistency with strategic policies for adjoining areas; and
- 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, there has been a 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 will be available to view at the Council's website. (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 shows the key constraints affecting the development capacity of land within the Thurrock urban area.

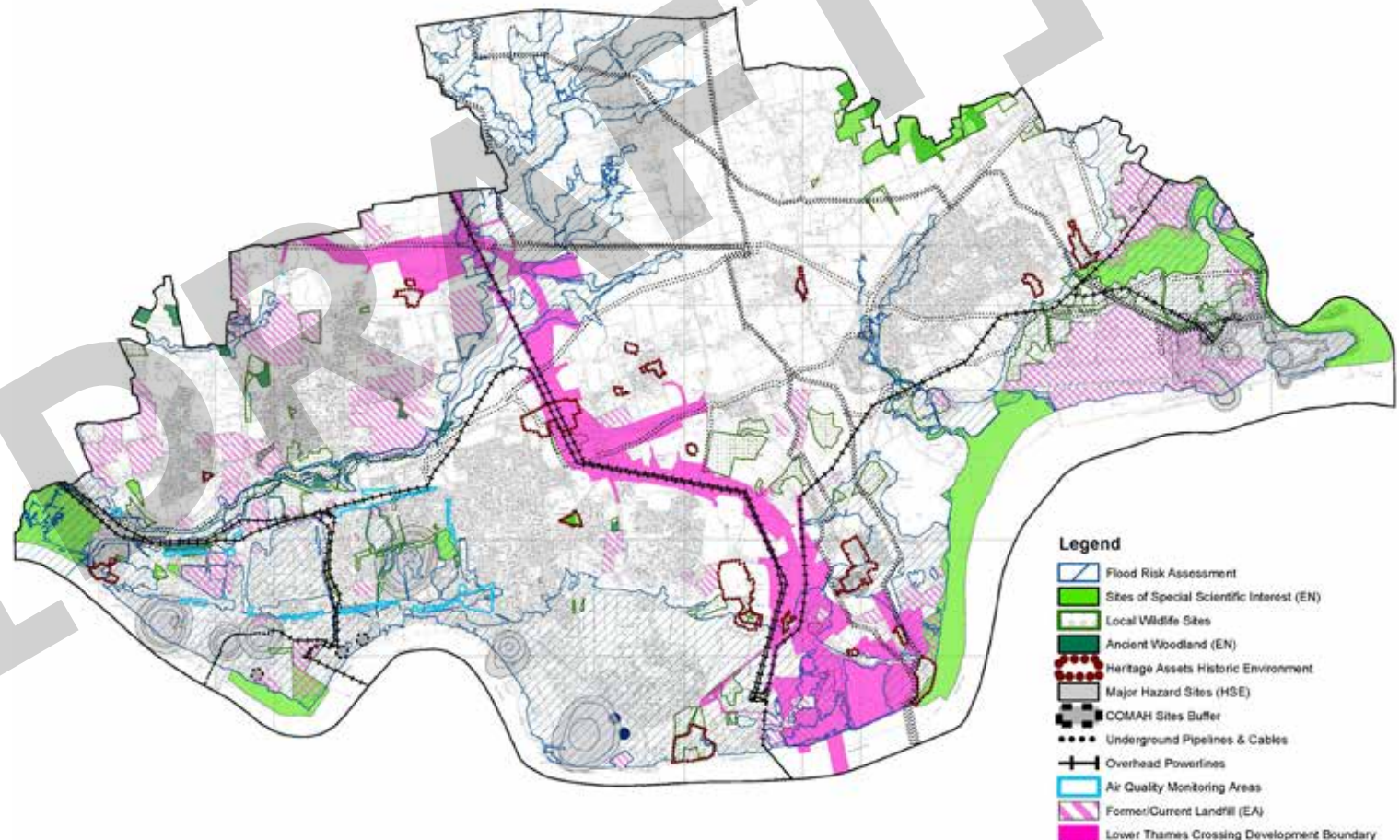


Figure 12: Thurrock Urban Area Development Constraints

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 shows the key constraints affecting the development capacity of land within the Metropolitan Green Belt.

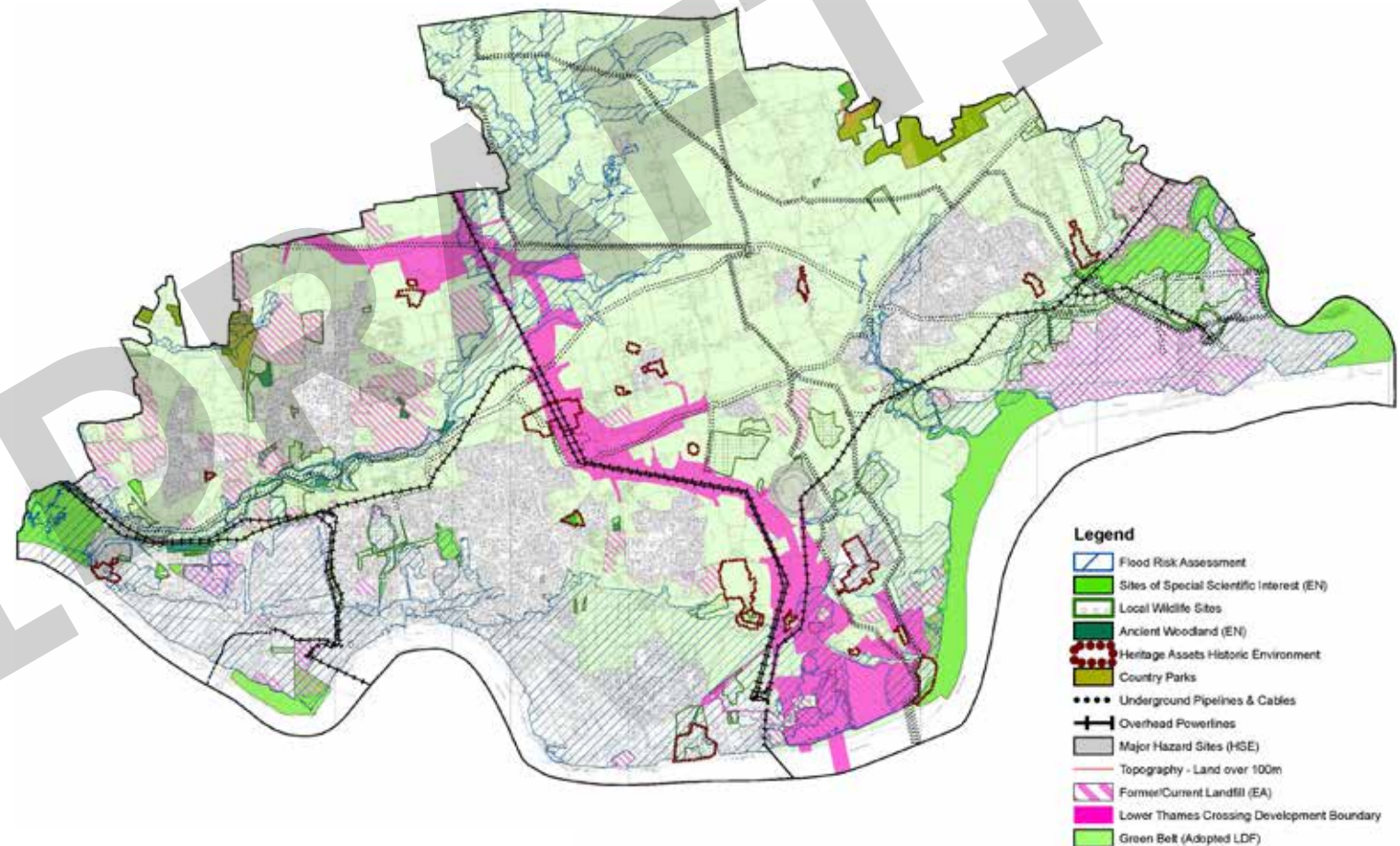


Figure 13: Green Belt Development Constraints

Lower Thames Crossing

The proposed alignment of the Lower Thames Crossing threatens to significantly undermine the efforts of the Council to plan to meet its objectively assessed housing needs in full and to support economic growth and the regeneration of existing local communities. Based on the scheme configuration shown in Figure 14, the Lower Thames Crossing will have an adverse impact on the potential to bring forward sites for development along the length of its route for a number of reasons. These include:

- The sterilization of development opportunities in sustainable locations around existing settlements;
- Poor local connectivity and a failure to explicitly plan and design a scheme with the objective of supporting the delivery of strategic sites for housing and economic growth;
- The need to mitigate the impact of noise, air quality, severance and flood risk considerations which has led to an increase in land take in locations where future development capacity exists.

The areas most affected include: land west of East Tilbury; land north of and east of Chadwell St Mary; land in and around 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 on-going 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. However, at this stage of the process it is questionable as to whether the design and development of the Lower

Thames Crossing scheme is being taken forward in a manner which supports future housing and economic growth in both Thurrock, or South Essex as a whole, and in a way which allows local authorities to maximise the investment in new nationally significant infrastructure in planning for growth as set out in the national policy guidance.

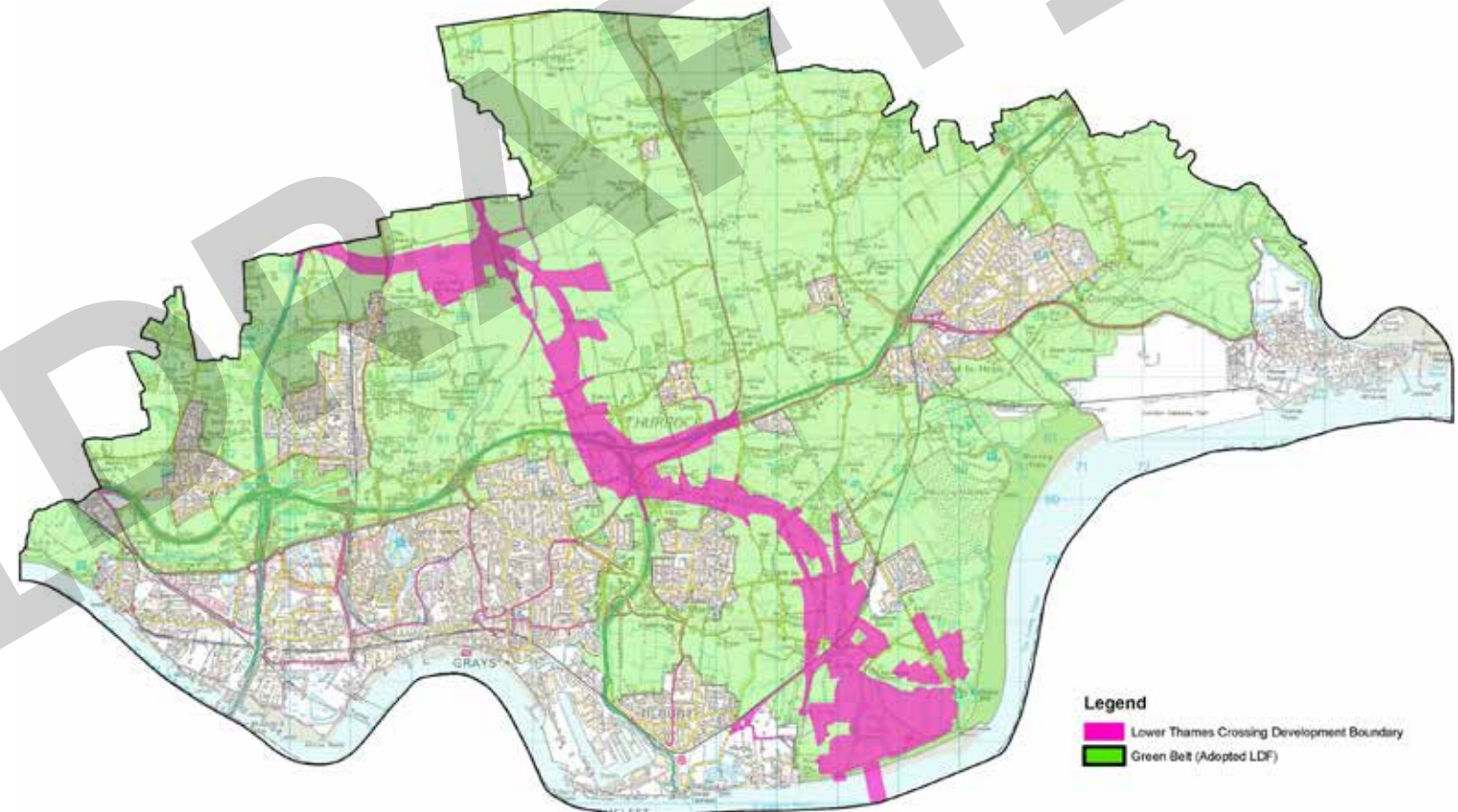


Figure 14: Lower Thames Crossing – Development Constraints

Spatial Options

The spatial 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 within the Draft Local Plan consultation stage.

The spatial options have been generated based on the evidence produced to support the production of the Local Plan. A key part of this evidence is the Housing Land Availability Assessment and the Call for Sites exercise, whereby sites are promoted for development by landowners, developers, and other interested parties. It is important to stress that whilst the spatial options presented in this document are primarily based on a market response to where new development should be located, the sites promoted for development have simply been taken at 'face-value' and have not yet been fully assessed in terms of their suitability. The inclusion of a site within a 'development option' is in no way an endorsement by the Council of the suitability of a particular site for development.

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 seven 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. Figure 15 shows the sites that are in the process of being assessed by the Council to determine their development potential and which have informed the spatial options presented for comment in this document. Figure 16 shows the various spatial options which are discussed in turn in the following sections.

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 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.

As mentioned previously, the sites being presented in this document are sites which have been promoted by landowners, developers and other stakeholders as being good locations for future development. As the authority works towards preparing a draft plan, it will be necessary for a more detailed assessment of these sites to take place. This assessment will include looking at issues relating to physical constraints, site accessibility to key services and market interest. The findings of this assessment will then need to be balanced alongside feedback from this consultation and other key technical documents as the Council works towards defining its preferred development option.

It is also worth noting that as the Local Plan process progresses more sites may be submitted to the Council for consideration through future call for sites and other means, including the inclusion of Council owned assets.

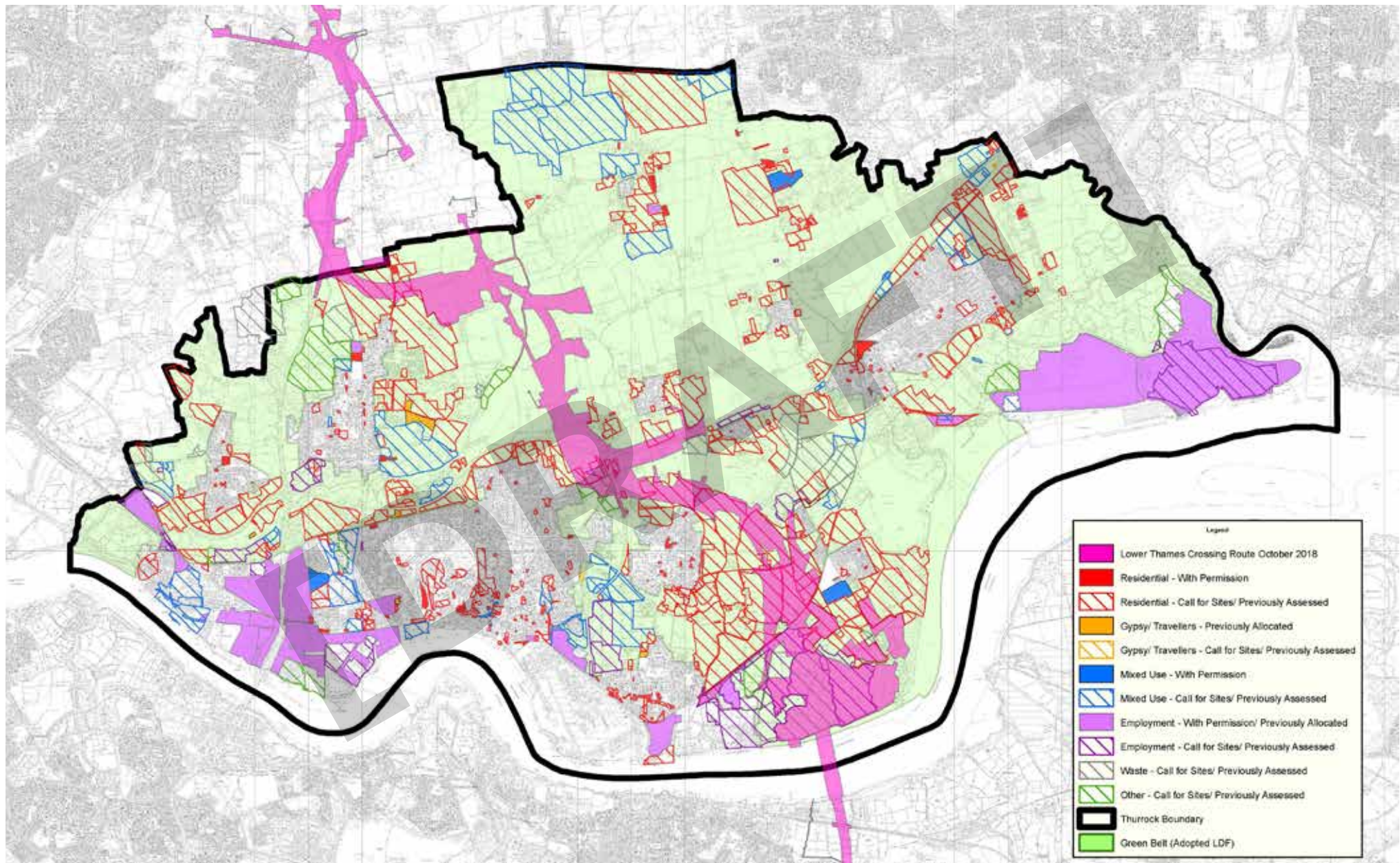
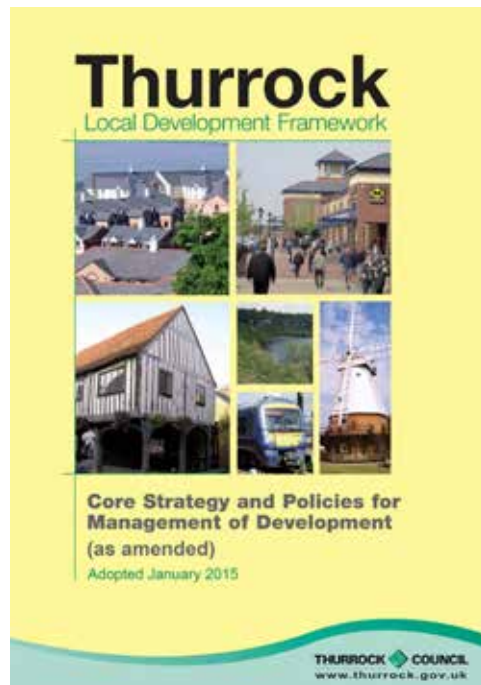


Figure 15: Call for Sites Map

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 meaning that the Borough will fail to meet its identified housing need;
- Thurrock's current rolling 5 year land supply is less than 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.

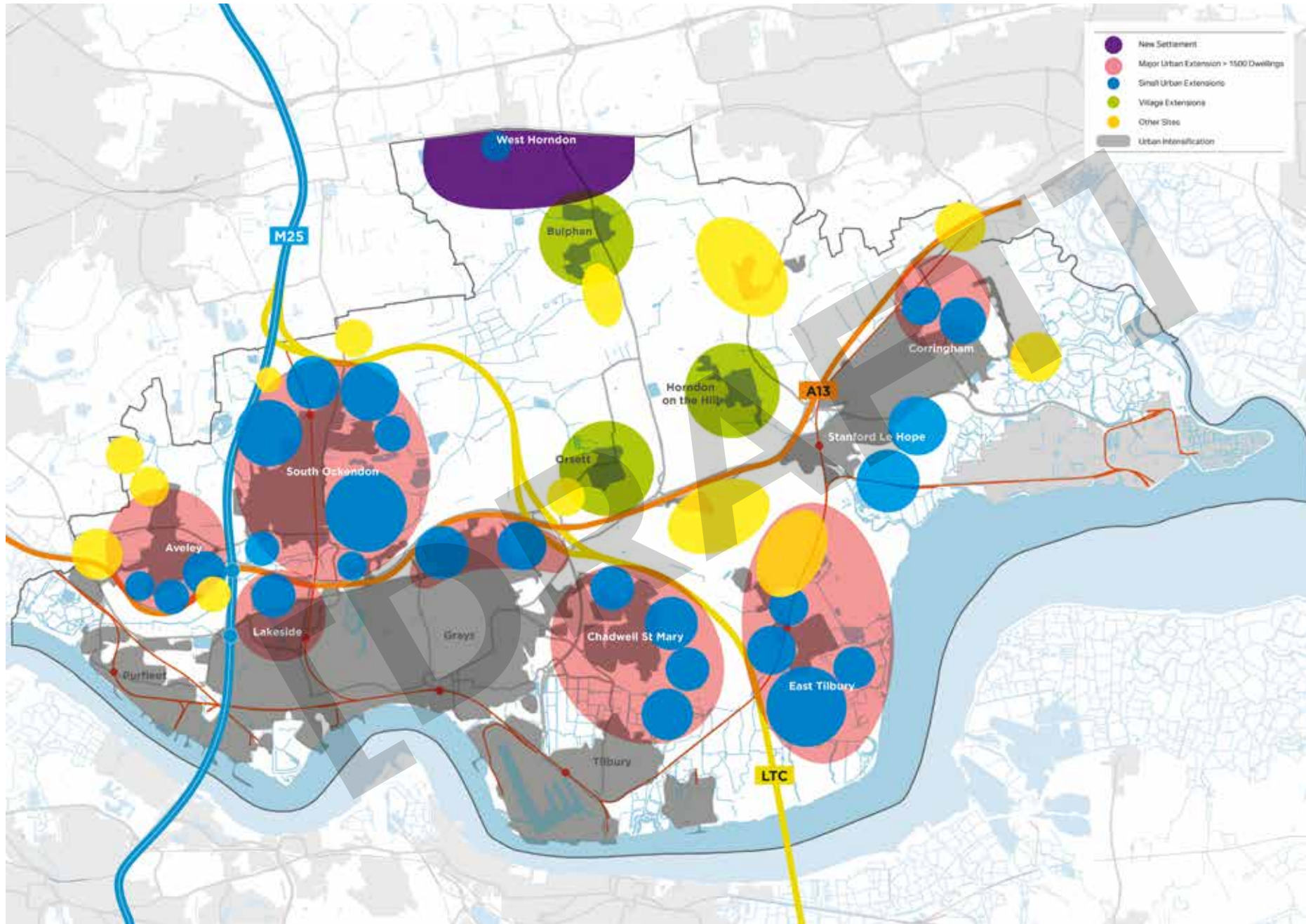


Figure 16: Map showing spatial options - Based on sites/broad locations with developer interest
 NB. These are potential, broad options for growth not proposed allocations

Option 1: Urban Intensification

Option 1 seeks to boost the supply of housing land within the built-up area through the redevelopment and 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 relocation of uses which are inappropriately located in residential areas.
- 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, the reliance on urban infill in recent years (so opportunities are diminishing) 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 can also support wider investment in community facilities and infrastructure.

There is no doubt, however, that local people want to see more opportunities for redevelopment within existing urban areas realised. There are some prominent 'problem' sites which are challenging to bring forward, but if they can be regenerated there would be a lasting, beneficial impact on local

Opportunities

Continuing to support and facilitate redevelopment of urban sites and the wider regeneration of urban areas, particularly existing centres and larger housing estates:

- 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.
- Has 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.

communities. Consultation with members and elected representatives has highlighted :

- Concern about the decline of retailing in centres and the scope for new uses to be introduced.
- A desire to connect with and improve the riverfront particularly in Grays.
- Poor facilities and degraded spaces within post-war housing areas.
- The environmental impact of 'dirty' industries with and adjoining existing residential areas.

Challenges

- Urban intensification would only marginally increase the supply of housing land due to the impacts of site availability, 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.
- Potential for significant new housing at Lakeside constrained by the retailers' preferred operational models (access/servicing arrangements and surface level car parking) and the high land values associated with retail uses.
- Re-allocation of strategically important employment land for housing could impact upon economic growth and job creation. Difficult to relocate existing employment uses and remediate former employment land.
- Higher density development within the urban area may not be viable given high build costs and may not be fit with existing character.
- Any loss of urban green space would may have an adverse impact on community health and well-being.

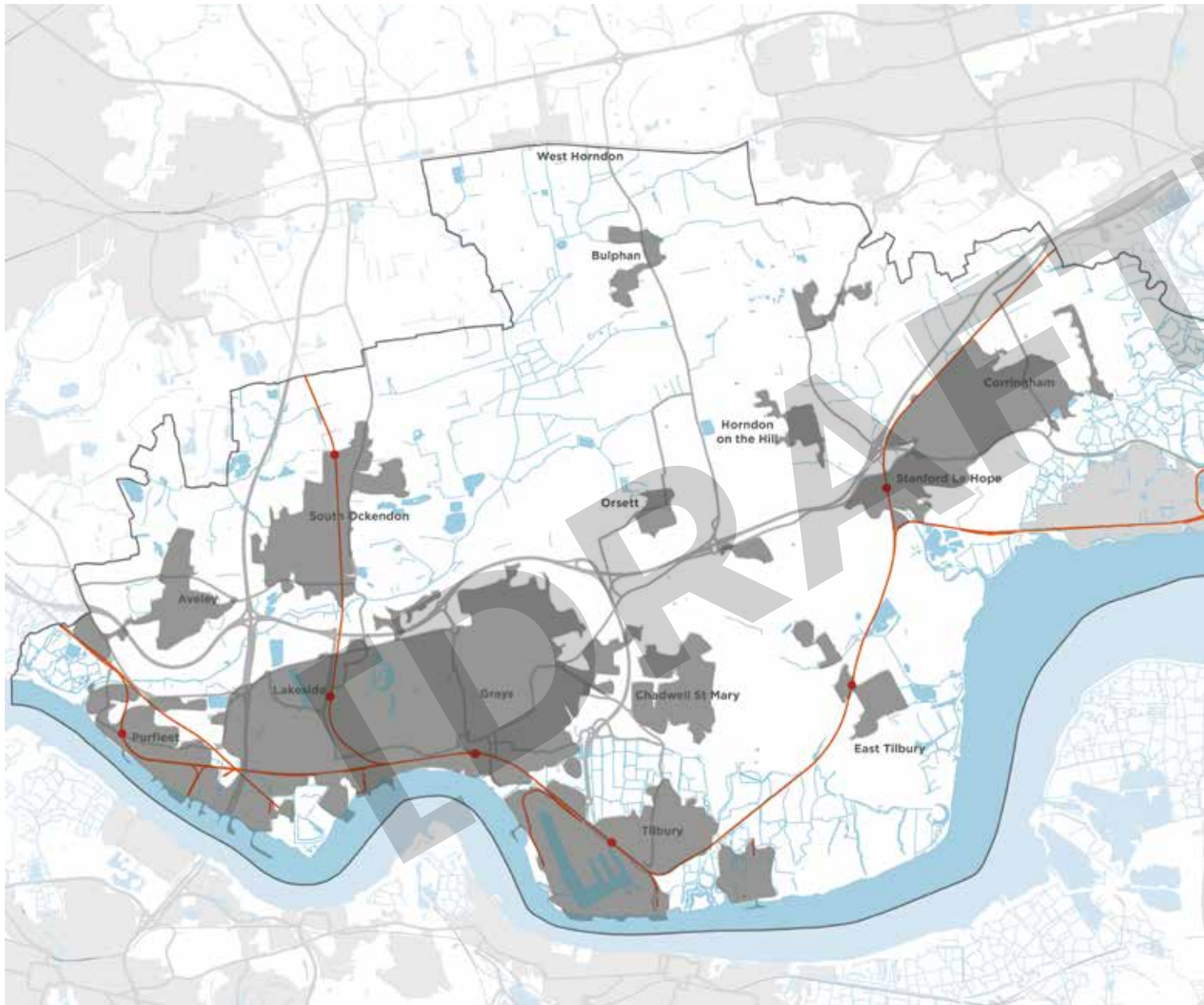


Figure 17: Thurrock Existing Urban Area and Villages

QUESTION 13: Urban Intensification

- Do you believe that adopting the approach set out under this option is an appropriate option for consideration or, if not, why not?
- Are there any other opportunities or challenges that you think ought to be taken into account in assessing this option?
- 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

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. In some areas these constraints mean that the full need cannot be met.

The National Planning Policy Framework (NPPF) requires local planning authorities to work collaboratively with each other and other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans (this is referred to as the 'Duty to Cooperate'). Through joint working, local planning authorities should collaborate and work together to meet development requirements which cannot wholly be met within their own areas.

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 is if a neighbouring authority or authorities agree, through the Duty to Cooperate process and preparation of the Joint Strategic Plan, to accommodate all or part of the unmet housing need.

Opportunities

The Duty to Co-operate provides a potential mechanism to reduce the scale of development that needs to be planned for within the administrative boundary of Thurrock, and therefore incursion into the Thurrock Green Belt, 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 ability of local people to find a home; affordability (house prices and rents rise in response to a shortage in supply); the quality of life of Borough residents; the local economy; and lead to an increase in commuting, thereby further adding to congestion on the local road network.

QUESTION 14:

Duty-To-Cooperate

- Do you believe that adopting the approach set out under this option is an appropriate option for consideration or, if not, why not?
- Are there any other opportunities or challenges that you think ought to be taken into account in assessing this option?
- 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?

Option 3: Green Belt Development New Settlement

New settlements offer scope to accommodate large scale development in a planned and co-ordinated way. Delivering freestanding new settlements is challenging, especially the funding and delivery of new infrastructure, but their development can relieve pressure upon existing settlements and infrastructure and meet growth needs sustainably, in that all the components of the settlement and the needs of the new community can be planned, comprehensively.

Sizable new settlements change the geography of an area in terms of patterns of movement and activity. Wider impacts, cumulative effects and competing calls on investment need therefore to be considered carefully, especially if new settlements are brought forward in tandem with intensification and expansion of established urban areas.

Consultation with residents and elected representatives does reveal some appetite to consider this approach to new development:

- There is some concern to maintain the character of existing settlements. Creating a new community, with a distinct identity, avoids this issue.
- Building within the Green Belt creates opportunity to upgrade 'scruffy' areas and give residents better access to attractive greenspaces.
- Access to and quality of greenspace is a universal priority – urban extensions can distance existing communities from the countryside; a new settlement provides an alternative approach.

The opportunity for developing one or more new settlements in Thurrock is constrained by the nature and character of the Borough and the existing pattern of development and transport connectivity. Based on landowner/developer submissions to the Call for Sites process, the only potential location for bringing forward a new settlement of a significant scale lies in the expansion of West Horndon on land around the C2C Fenchurch Street - Shoeburyness railway line.

The exact scale of development that may be considered deliverable in this location would be subject to further assessment through the plan-making process. For the purpose of this consultation, the Council is seeking comments on the provision of a new settlement of a minimum of 10,000 new homes as this is the scale of development that is generally regarded as a 'new town' and enables the settlement to have a high degree of self-containment, with a range of employment opportunities and supporting social infrastructure. Further assessment of this option following the consultation may conclude that a higher or lower amount of development may be more appropriate.

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.

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.



Opportunities

There is potential to deliver a new freestanding settlement/Garden Village of a significant scale, focused upon West Horndon, on land around the C2C Fenchurch Street to Shoeburyness railway line. The proposal involves:

- A limited number of land owners, potentially increasing the deliverability of the project.
- Potential opportunities to bid for Government funding to support the delivery of strategic infrastructure.
- Critical mass of development that could help to secure the infrastructure needed to support the development.



Challenges

- This broad location is quite detached from the Thurrock urban area (in terms of character, linkage and function). Therefore development at West Horndon has challenges in providing a range of market and affordable housing to meet the needs of the existing residents of Thurrock. Any proposal would need to evidence how these matters could be addressed. In addition, north-south connectivity and would need to be improved so as to ensure spin-off economic benefits for existing businesses located within the existing Thurrock urban area.
- 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 and upgrade the A127.
- 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 on the Green Belt and landscape character, and flood risk considerations.

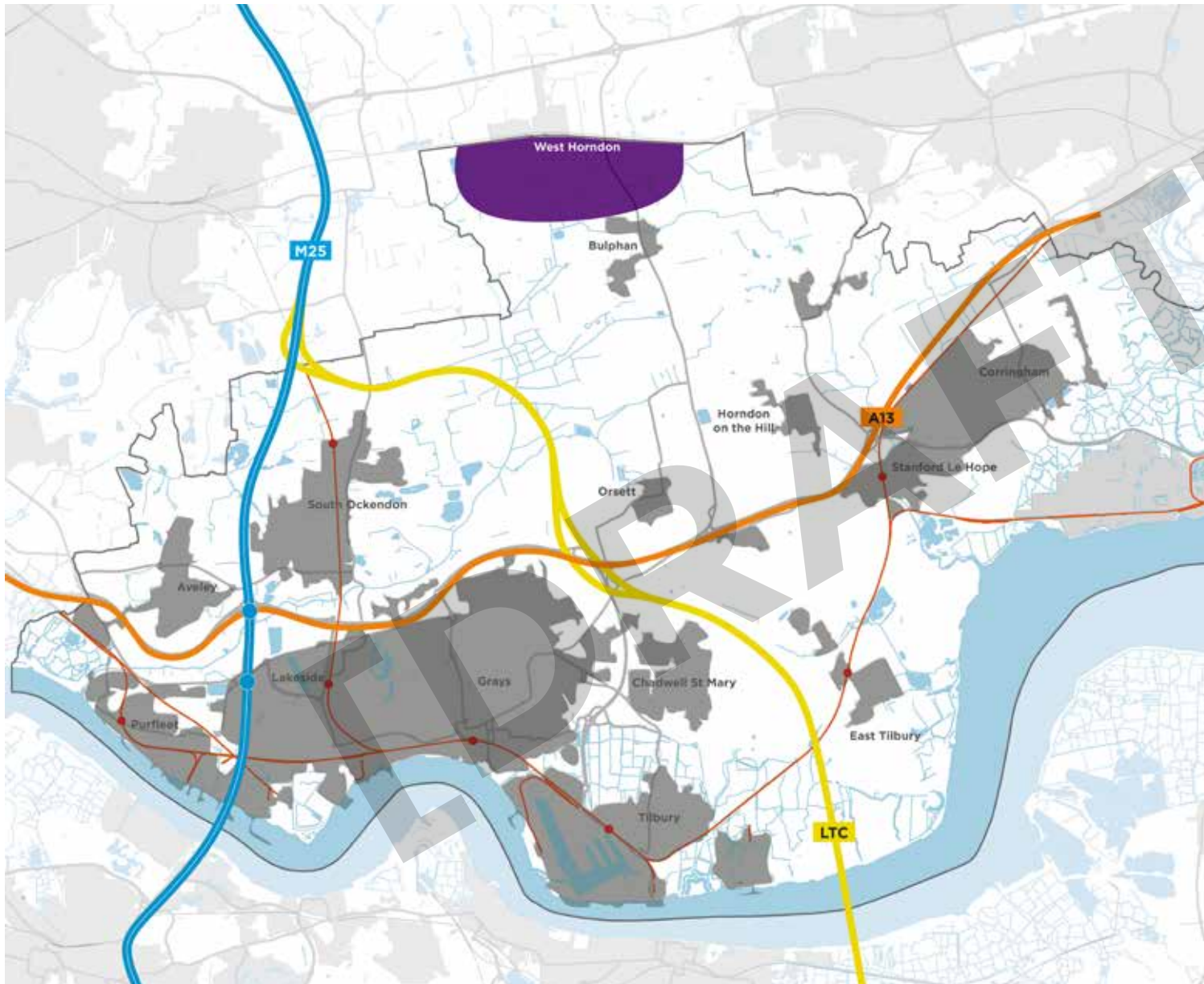


Figure 18: New Settlement (up to 10,000 homes) - Sites with developer interest

QUESTION 15: New Settlement

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

Urban Extensions

Urban extensions provide an opportunity to accommodate growth needs at a range of scales from small 'add-ons' (tens of dwellings), to new neighbourhoods (maybe 500-1000 homes), to whole new districts (several thousand homes) which combine and link several new neighbourhoods.

The distinguishing feature of this option for growth is it relates to existing, established places and existing communities; the opportunities and challenges must be assessed across the whole settlement, not just the new development.

Consultation with existing residents and elected representatives in locations where there is potential for urban extensions has underlined the priorities attached to delivering growth. Responses highlight:

- How difficult it is for young people to find a home, particularly in the more rural areas.
- The huge demand for more affordable homes and those that meet special needs, particularly for the elderly.
- The need for more, accessible sports and leisure opportunities.
- The need to support business start-ups.
- The need for new health facilities.

Consultation responses also reveal a good level of understanding of the challenges and important asks associated with planning for growth:

- The need for early delivery of new infrastructure.
- The effect on already congested roads.
- The need to innovate and respond to the green agenda including provision of recycling facilities and electric charging points.
- Protecting historic and cultural assets.
- Protecting identity and integrating neighbourhoods (an issue which is highlighted as an existing issue in Aveley).

Consultation responses also make abundantly clear that the pressing issues of the day are those that impact upon the quality of life for existing residents, right now:

- A shortage of school places.
- Lack of GP capacity.
- Anti-social behaviour including drugs in the urban areas and fly tipping in the rural areas.
- Maintenance and investment in the upkeep of parks and open spaces.
- Access to facilities in the rural villages and the demise of bus services.
- A lack of community spaces.
- Struggling town and local centres (particularly noted in Grays) facing parking issues, congestion, declining retailing and a lack of vibrancy in the evenings.

The Local Plan alone cannot provide solutions to all these needs and challenges, but it can play an important part. The ambition is to create a better environment and increase opportunities (to work, to learn, to shop and pursue leisure) for all residents, whether living in the heart of one of Thurrock's old towns and villages or moving into a new home in a planned, new neighbourhood.

In planning for growth, it is:

Possible to respond to some of these needs and realise multiple, wider benefits from the associated investment.

Necessary to safeguard and mitigate against development that negatively impacts and burdens existing communities.

Opportunities

Providing the homes that the residents of Thurrock need is the primary driver, but larger urban extensions offer the potential for growth which meets a number of other objectives and is distinct from other growth options:

1. A very wide range of different housing needs can be met. This includes the ability to increase the financial viability of delivering much more affordable housing.
2. New development will deliver investment in new community infrastructure and services, for example, schools, health facilities, community buildings and recreation space. This can be achieved through a combination of investment within the new development and in existing facilities in the established settlement, especially those that have suffered from a lack of investment or lack capacity to meet existing needs. Delivery alongside existing or proposed employment locations, town or local centres and key public transport hubs means less need to travel to meet daily needs.
3. Can support the regeneration of existing urban areas.
4. If the quality is right, large-scale development can have real impact and change people's perceptions of Thurrock.



5. Urban extensions make good use of historic investment in infrastructure, particularly roads and public transport, much of which now needs a boost in investment and patronage.
6. They can achieve growth at a scale where the enlarged population can make a significant difference to the function and vitality to the whole place, old and new. Services and facilities which may be struggling to remain viable, from shops and buses to sports clubs and community groups, benefit from a sizable influx of population.
7. Large scale housing developments are more likely to attract Government funding support to cover the cost of up-front infrastructure provision.
8. A smaller number of larger Green Belt releases makes it easier to preserve the integrity of the Green Belt at a strategic level and focus on its primary purpose.

The Potential Locations for Major Urban Extensions

Seven key locations in the Borough have potential to accommodate at least 1,500 homes as sustainable urban extensions; and there is sufficient land being promoted for developments to suggest deliverable proposals can emerge, guided by the Local Plan. At this stage these locations are options, and development proposals could deliver new housing at a scale which would bring associated education, health, employment, retail and other supporting community uses.

The areas that could be considered include:

South Ockendon

South Ockendon has the potential to accommodate a large-scale urban extension comprising an interlinked network of garden villages to the north and east of the existing urban area. With sufficient scale comes the opportunity to advance a strategic transport solution (road and rail) for the town. It could also support the regeneration of the urban area, including additional community facilities.

Lakeside

An urban extension on land at Arena Essex to the north of Lakeside has the potential to accommodate new homes and additional community, educational and/or health facilities to support residential development across the wider area, alongside more mixed-use development including new homes adjacent to the intu Lakeside Shopping Centre and retail parks.

Aveley

An urban extension to the south of Aveley has the potential to support the regeneration of Aveley centre, enhancement of the village in keeping with its character, as well as new education and community facilities, improvements to the A13 corridor and connections into an extension of the South Ockendon Country Park.

Chadwell St Mary

An urban extension at Chadwell St Mary has the potential to support the regeneration of Chadwell St Mary centre, provide new education and community facilities, upgrade transport links and deliver generous strategic landscaping and open spaces.

East Tilbury

An urban extension at East Tilbury has the potential to establish a more sustainable settlement 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. Improving connectivity for existing residents would be a priority.

Corringham

An urban extension at Corringham has the potential to accommodate new homes, 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. This would be linked to enhancement of the town centre.

North Grays

An urban extension to the north of Grays has the potential to accommodate a new neighbourhood with associated amenities, local centre enhancements and a linear park offering leisure and recreational opportunities for existing and future residents.

Challenges

- Large scale urban extensions are 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 bespoke delivery arrangements and funding mechanisms.
- Large scale development can change the nature/character of the existing settlement.
- Urban extensions have the most direct impact upon immediately adjoining communities.

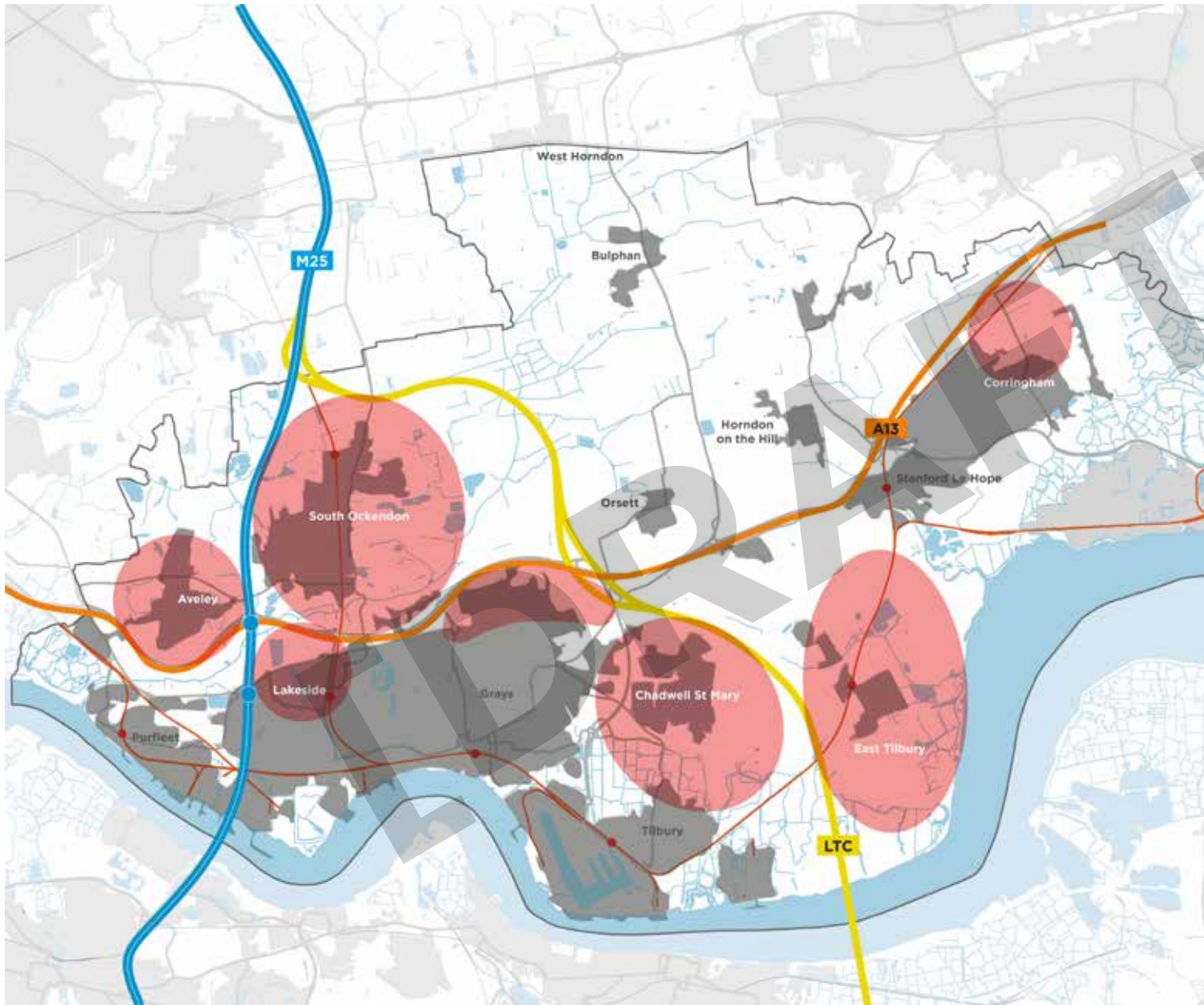


Figure 19: Major Urban Extensions (each over 1,500 homes) - Sites with developer interest

QUESTION 16: Major Urban Extensions

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

Small Urban Extensions

Consultation with existing residents and elected representatives has not, so far, drilled into the relative merits of the different options for growth. But it is evident from the consultation responses noted on page 64, that the preferred option for growth will need to reflect the scope to maximise the benefit to existing and new residents from the investment made. Landownership is relevant in shaping the strategy, but efficiency and economies of scale and different approaches to delivery and funding, will also be important considerations if the Local Plan to afford enough priority to delivery of affordable housing; community infrastructure, access and movement and place making.

Most private sector promoters/ housebuilders are geared towards bringing forward small/medium sized urban extensions. Landowner/ developer submissions to the Call for Sites process, present a large number of options for small urban extensions across the whole borough, on a range of sites capable of accommodating approximately 50-1,500 homes each; many could be sub-divided or amalgamated into the larger extensions. These sites are typically in green belt urban fringe locations adjacent to the main urban areas in the borough.

The scale of the opportunities presented reflect the ability of individual private sector interests to assemble and control land; this does not necessarily correlate with planning and delivering an optimal pattern of growth. A critical aspect of the next stage of plan preparation, informed by the consultation outcomes, will be to determine whether more, smaller extensions or a few larger extensions are preferable.

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 Sustainability Assessment processes.

Opportunities

Smaller urban extensions represent the growth option to which the private sector housebuilders will most readily respond. They:

- Are usually less complex in terms of infrastructure requirements – they can often rely on capacity within existing facilities or networks or make contributions to ‘top-up’ that capacity, rather than make new provision.
- Make 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.
- Reduce the need for, and impact of, significant incursions into the Green Belt that could occur from focusing on fewer but larger urban extensions.
- Provide 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.



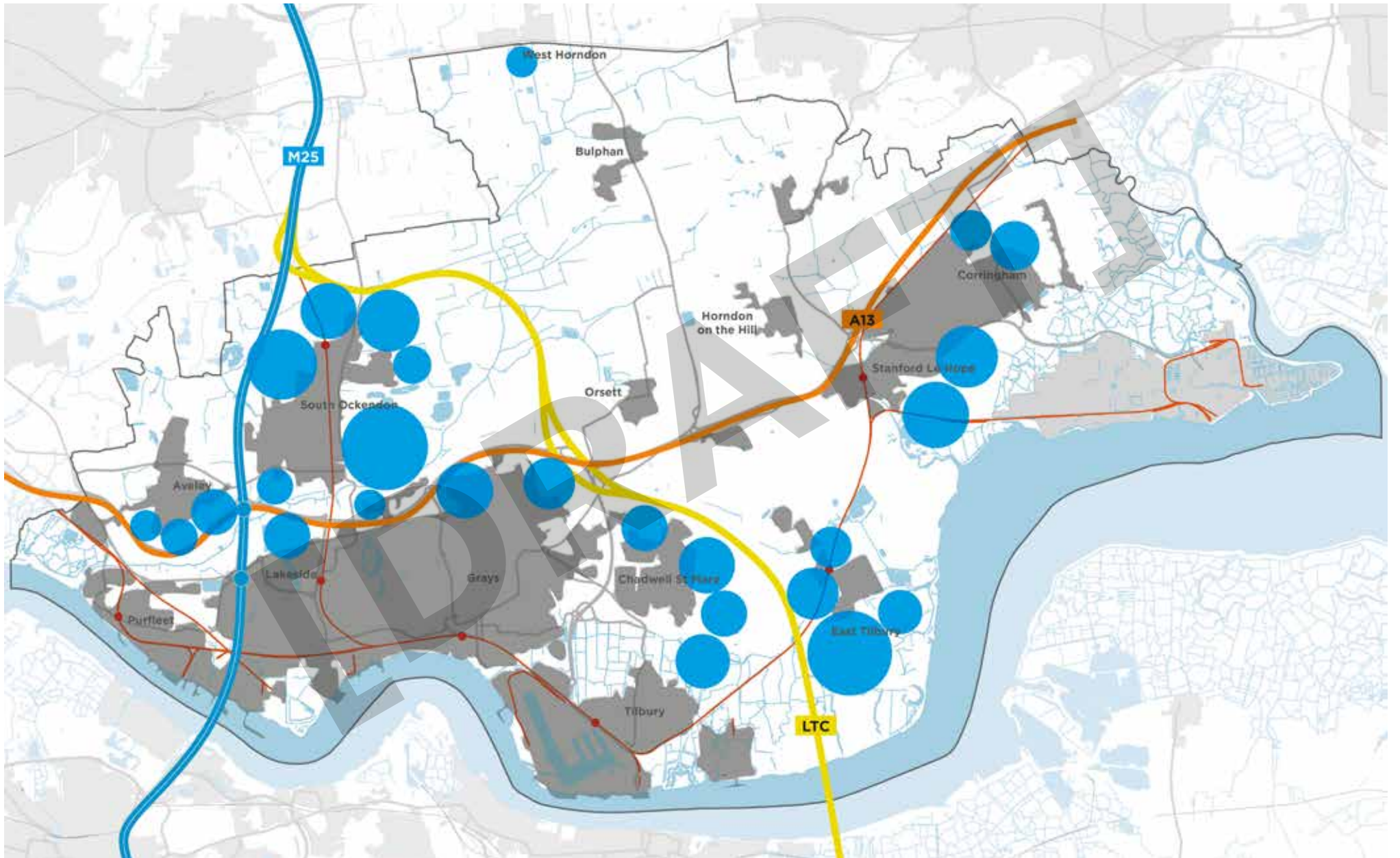


Figure 20: Small Urban Extensions (less than 1,500 homes) - Sites with developer interest

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.
- It may be more difficult to secure the provision of the full range of community facilities required to create new sustainable communities due to the smaller size of development sites under this option.
- 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.

QUESTION 17: Small Urban Extensions

- 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?

Village Expansions

Village expansion provides an opportunity to accommodate some growth; although the overall capacity is constrained. It presents an opportunity to inject vitality into smaller settlements, particularly giving younger people that may have grown up in a village or those that work in the rural economy, chance to maintain important local connections. Where homes can be built to serve these needs, they may help to maintain demographic balance and increase population to support and renew village services and facilities. This may help to make the villages more 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 daily needs.

The challenge is to avoid unsustainable development in rural areas, with housing growth:

- out of proportion with the existing community and the related jobs and services;
- that increases long distance travel by car or creates dormitory communities;
- or fundamentally alters the cherished character of the rural area.

Landowner/developer submissions to the Call for Sites process, indicate ambition for development around the villages of Bulphan, Orsett and Horndon on the Hill, with varying scales of growth envisaged.

Consultation with existing residents and elected representatives highlights the issues which are particular to the rural communities:

- Character, history and village tradition is greatly valued, but easily lost.
- There is need to provide homes and sheltered housing for an aging population.
- There is difficulty in accessing basic amenities (local shop/pub) in smaller communities such as Bulphan.
- Limited bus services.
- Pressure on services, particularly GPs, and ambition to protect local services against cuts.
- The need for more meeting spaces and activities for young people.
- A lack of housing opportunities for young people.
- Anti-social behaviour such as speeding and littering on rural/village roads.

Additional development in the villages might be planned to help address some of these issues; it might also give rise to competing priorities.

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

Opportunities

Appropriately scaled village expansion could deliver:

- A critical mass of new development to 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 that would raise the demand/viability of providing improved or new public transport services.
- A wider range of housing types, including affordable housing, to meet the needs of the local population.

Challenges

- Development of scale 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.
- Development of scale would go beyond the natural capacity of the villages and their setting to absorb growth and lead to irreversible damage to their character and the physical and natural environment.
- Development of scale in the vicinity of the villages would lead to a significant increase in local congestion as traffic movements exceed the capacity of the local.
- 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.

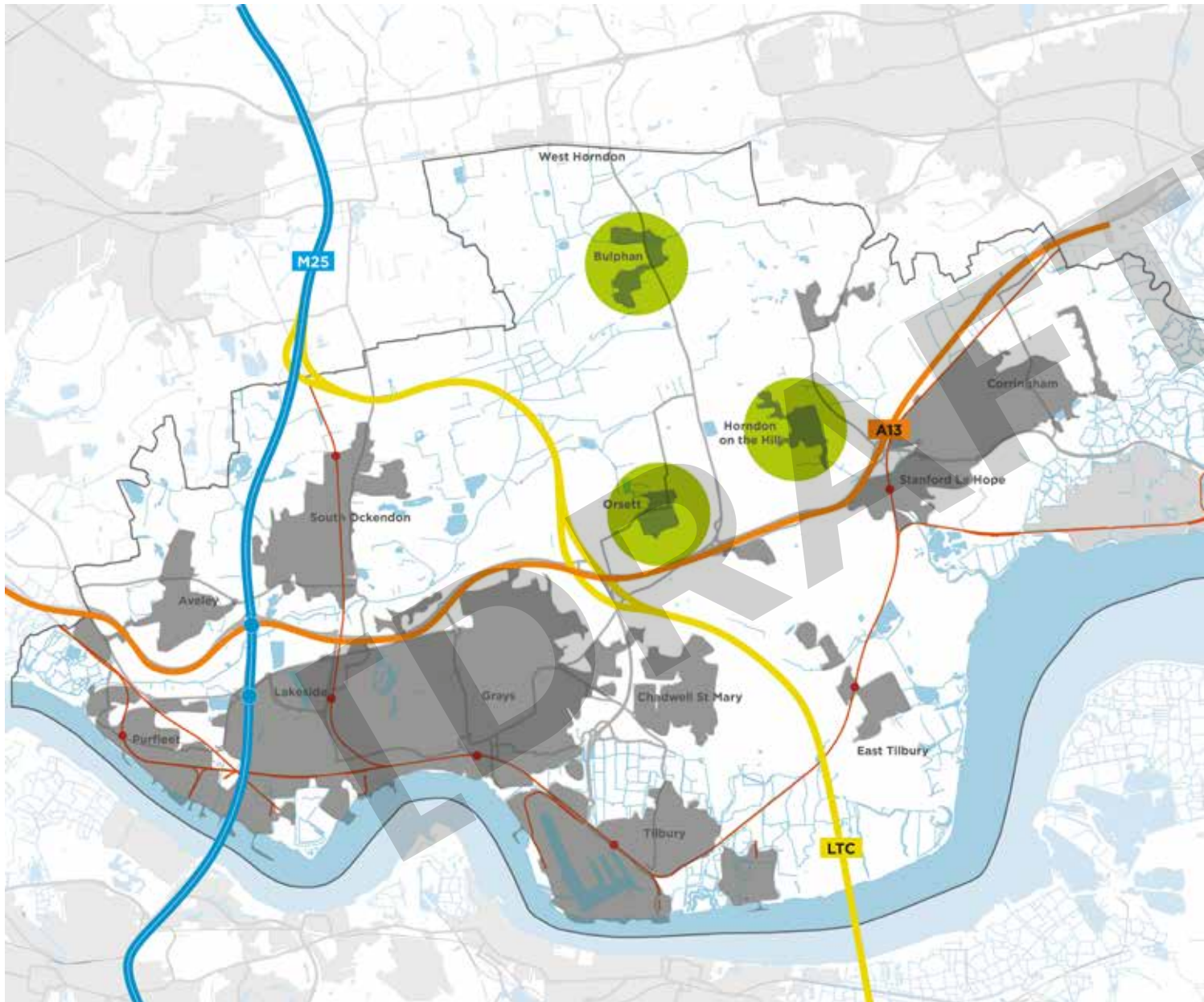


Figure 21: Village Expansions (up to 1,500 homes) - Sites with developer interest

QUESTION 18: Village Expansions

- 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?

Isolated Site Allocations

Further development scenarios have emerged through the Call for Sites on somewhat isolated sites that do not easily connect with existing settlements. Unlike other Green Belt Development Types these sites are not of a scale where they could realistically provide the on-site infrastructure and services (such as retail, community and educational facilities) to create high quality, sustainable development and adequately address the impact of the incoming population.

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 Sustainability Assessment processes.

Opportunities

There may be some scope to examine the reuse and redevelopment of previously developed land (PDL) in the Green Belt.

Challenges

- A more dispersed pattern of development of typically less than 500 homes, would be unlikely to generate the critical 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 and car use.

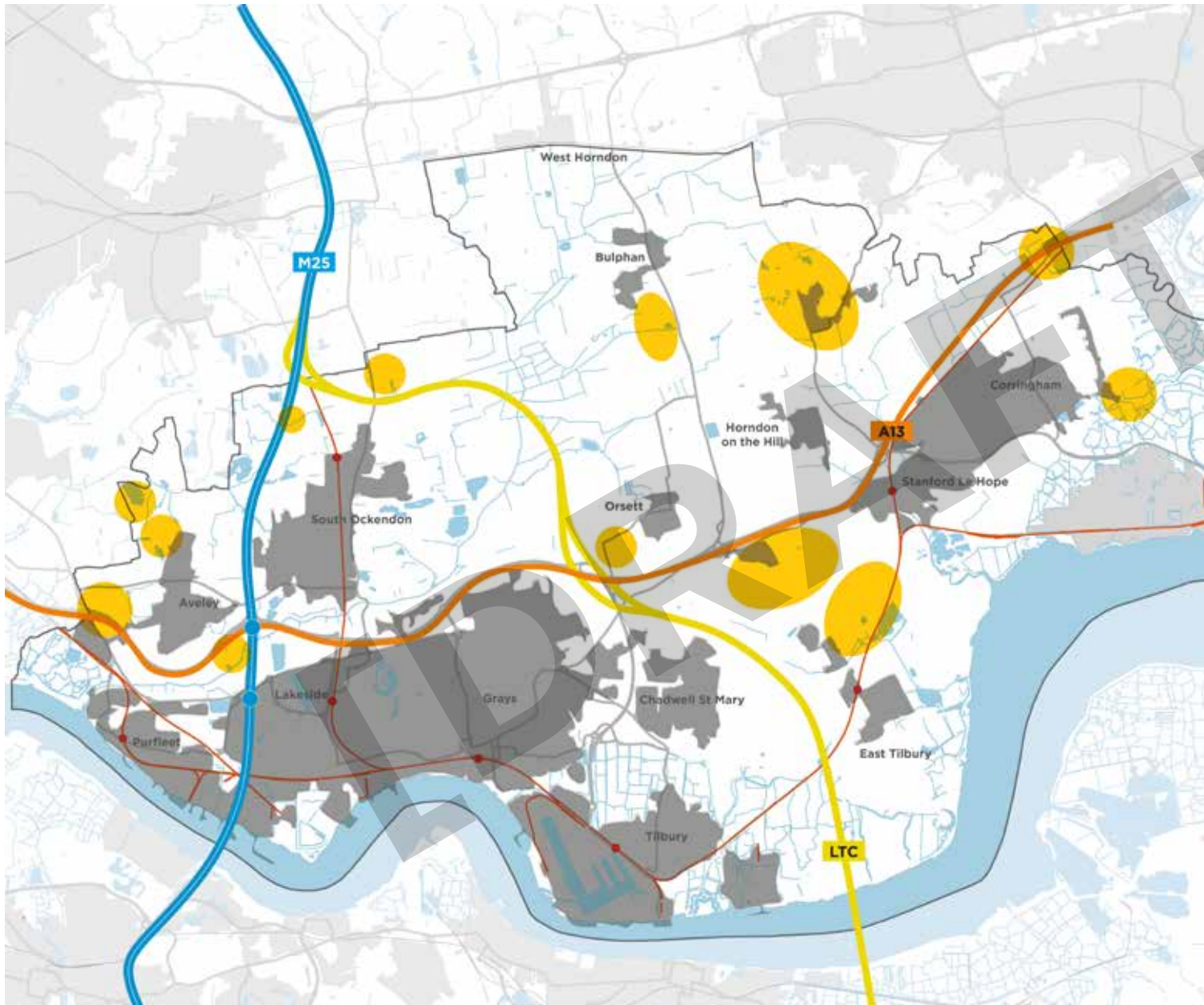


Figure 22: Isolated Site Allocations (typically under 500 homes) - Sites with developer interest

QUESTION 19: Isolated Site Allocations

- 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 81 of the NPPF states that planning policies should:

- Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.
- Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
- Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and
- Be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.

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 is 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 the forecast growth in jobs – 24,500 over the plan period; 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.

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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).

Key findings and conclusions

Figure 24 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.

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 25, 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 is important to note that the majority of this available supply includes land at London Gateway, which has consent for 82,9700 sqm under the London Gateway Logistics Park Local Development Order; land at Thames Enterprise Park which is now the subject of a planning application 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 and consented to accommodate future strategic employment needs.

Figure 24: 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
Total South Essex	1,564,375	358,438	159,042	1,046,824
LAND (ha)				
Thurrock	259	4	14	241
Total South Essex	345	44	42	260

Source: Draft South Essex Economic Development Needs Assessment 2017

Figure 25: 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 26 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. The capacity of these sites to accommodate residential development as either an alternative use or mixed use development scheme is 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.

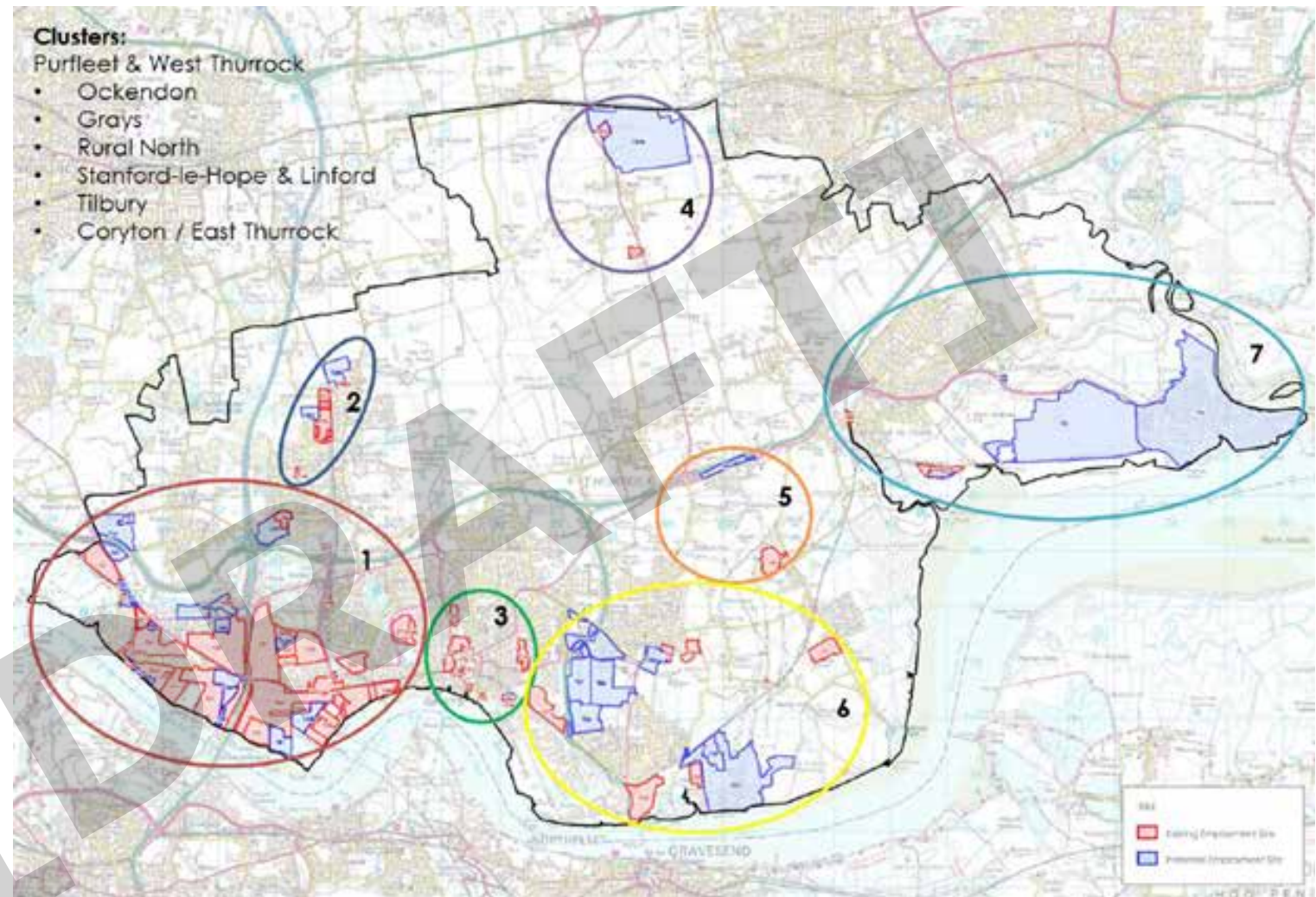


Figure 26: EDNA Thurrock Overview Map: Existing and Potential Employment Clusters

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 projected 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. This in itself could provide justification for the identification of additional employment land to meet the need to diversify the Boroughs employment base and/or meet wider South Essex economic growth requirements.
- 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 impact of the Lower Thames Crossing until the scheme has been confirmed. This includes the provision and location of any junctions which serve to open up access.
- 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

The NPPF recognises that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. 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. As required by the NPPF, 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; and should prioritise 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?

DRAFT

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

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 85 of the NPPF requires that 'planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation'. This includes a requirement that 'anticipated needs for retail, leisure, office and other main town centre uses' are met in full over at least the next 10 year period and should not be compromised by limited site availability.

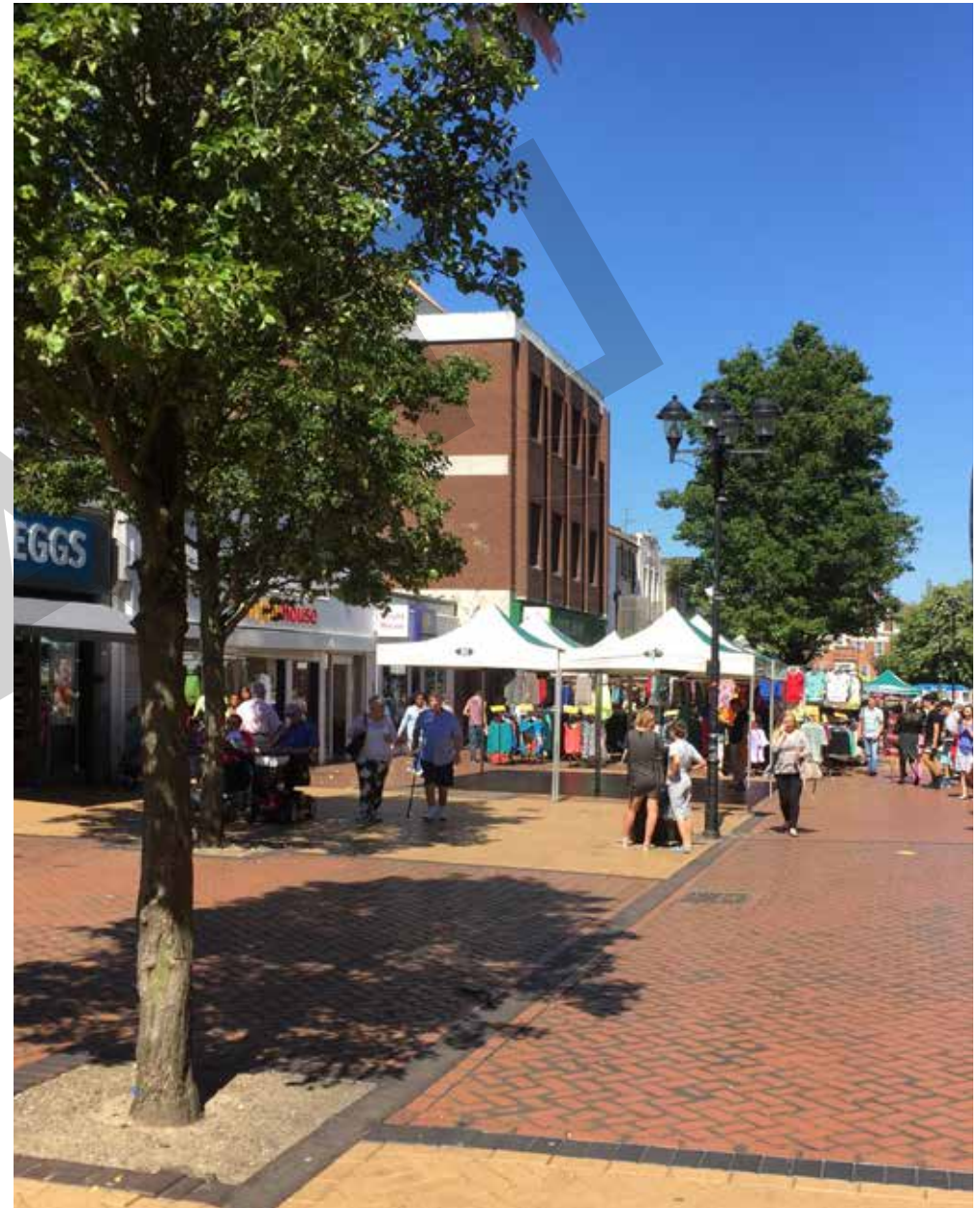
Identifying future retail and leisure needs

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.

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 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.
- intu 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.

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).

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 2037? 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).

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).



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 85 of the NPPF requires that planning policies should promote the long-term vitality and viability of town centres by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters. In drawing up Local Plans, local planning authorities are asked to define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre.

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 shopping area. 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:

- How should the Town Centre Boundary at Lakeside be defined?
- How should the Primary Shopping Area 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 intu Lakeside Shopping Centre, it is still the main administrative centre in the Borough and a focus for a number of services and cultural activities.

National policy looks for town centres to become "attractive, diverse places where people want to live, visit and work." The Grays Town Centre Development Framework - commissioned by Thurrock Council to identify a range of opportunities to increase the prosperity and attractiveness.

The Development Framework sets out an aspirational vision for Grays and proposes:

"Building on its strengths as a Chartered Market Town, Grays will be an exciting, high quality destination for people to live, work, learn, shop and socialize. Reconnected to the River Thames, Grays will support growing resident, student and business communities throughout the day and entertain a diverse and vibrant population through the evening. Cafés, bars, restaurants, shops and markets will combine with culture, entertainment and events in unique venues to provide a safe and attractive place for communities to meet and businesses to thrive."

Today's high streets face ever greater competition from online retailing and changes in social trends which have affected their usage and the demand for services. In order to remain at the heart of community life, smaller town centres such as Grays which have witnessed a reduction in their comparison shopping function now need to diversify and, building upon their traditional local shopping roles, attract and sustain a greater range of leisure, cultural and civic uses to remain vibrant and vital places.

Today, comparison provision only makes up around a quarter of all floorspace in the town centre and includes a number of national multiple retailers alongside small independent local traders. However, in line with national trends for a centre of this size, there is currently only limited demand for new comparison goods floorspace within Grays. However, the picture is different in terms of convenience floorspace, where demand exists from discount food store operators for further representation within the area.

The challenge for the Local Plan is therefore to bring forward a land use planning and implementation strategy which helps deliver the vision set out Development Framework and ensures the delivery of new shopping, leisure and housing uses alongside improvements to access, car-parking and the quality of the public realm and built environment.

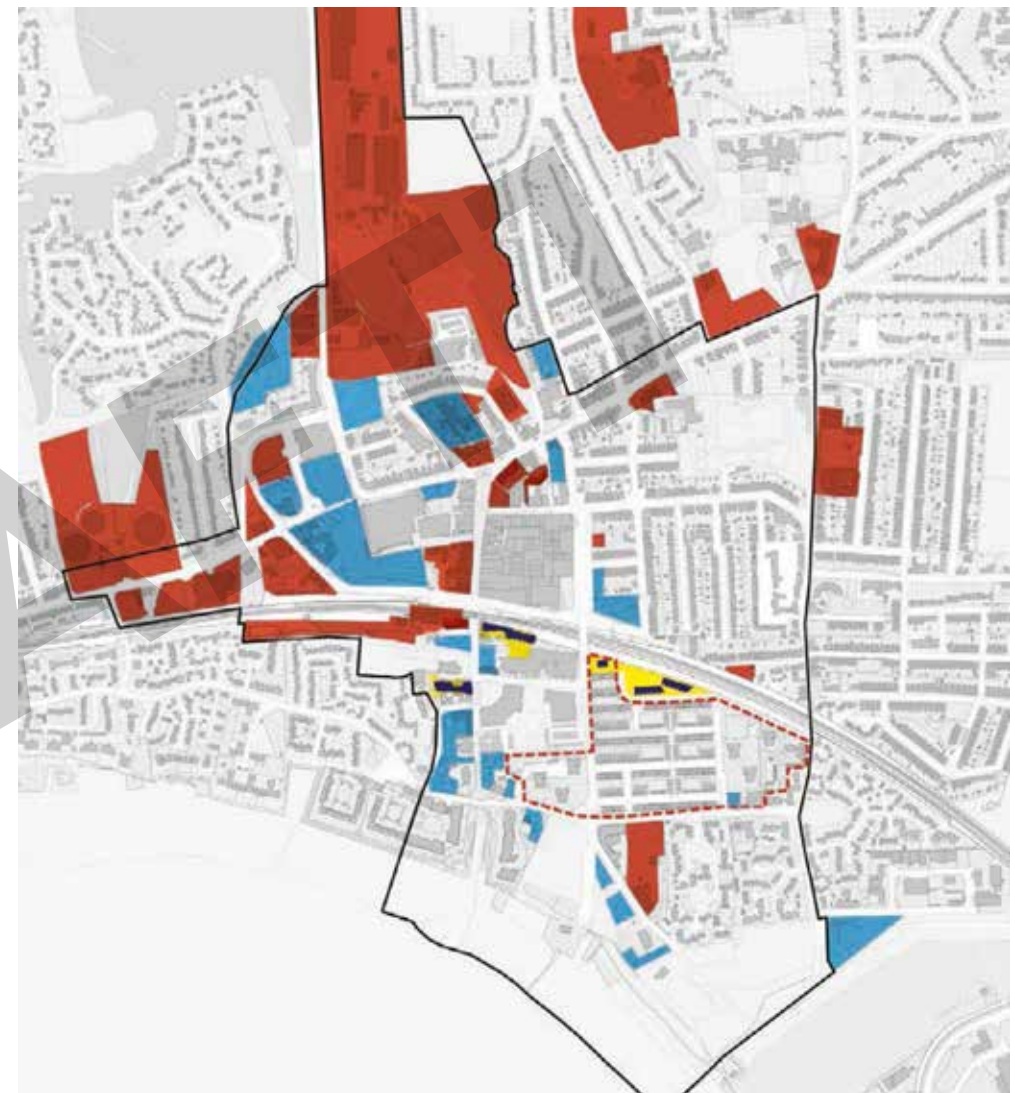


Figure 27: Grays Town Centre Development Framework

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 and/or should the focus be on strengthening and consolidating retail activity around the Grays Shopping Centre and adjoining areas?
- b) Should the Council manage the mix of permitted uses in Grays town centre to provide more flexibility to accommodate 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 and around the town centre?

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 CSTP7 – Network of Centres of the adopted Core Strategy and is set out in Figure 27. 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.

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.

Figure 27: 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	Purfleet, 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

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, 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 the primary shopping area 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.

The Thurrock Town Centre Health Check Assessment Report (2018) is available to view on the Council's Local Plan website. (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 and Betting Shops

Consultation with local communities and Members has shown that there is particular concern surrounding the proliferation of both hot food takeaways and betting shops within our town centres and other shopping areas.

Whilst it is recognised that hot food takeaways and betting shops offer a service to local communities and have a 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.

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/obese people 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.

Likewise, an over concentration of betting shops has also been linked with incidents of low-level crime and anti-social behavior. There is also a concern over the social impacts of betting shops with regard to the use of fixed odds betting terminals and their effect on health and well-being. This has been recognized by Government whom have introduced regulations that require a planning application to be submitted for new betting shops which require a change of use of an existing unit and measures to ensure that betting shop operators set out how they comply with social responsibility codes when applying for a gambling licence.

It should be stressed that both hot food takeaways and betting shops do have a role to play in our town centres and shopping parades but measures could be taken to prevent the clustering of these uses. Clustering of hot food takeaways and betting shops can create 'hotspots' which attract increased numbers of customers, particularly in the late evenings with regard to hot food takeaways, 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. The clustering of any use restricts the choice of retail outlets available and affects the retail appeal and sustainability of a shopping area.



QUESTION 33:

- a) Should there be restrictions on the number and distribution of hot food takeaways and betting shops 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: HEALTH & WELL-BEING

Sport and Recreation

Paragraph 96 of The National Planning Policy Framework (NPPF) states that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need

for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses and opportunities for new provision). Information gained from these assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.



The NPPF also requires that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- a) An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- b) The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- c) The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

In addition to the policy requirements set out in the NPPF, the Government also published 'Sporting Future: A New Strategy for an Active Nation' (December 2015) which recognises that sport can make a positive difference in improving physical and mental health, individual development, social and community development and economic development. Set against this background, Sport England, a key source of funding for new sporting facilities, has produced 'Towards an Active Nation', their 2016-2021 strategy which signals that their investment priorities will be tackling inactivity, children and young people, taking sport and activity into the mass market, supporting sport's core market, local delivery and the provision of new and improved facilities.

In order to inform the preparation of the Local Plan and respond to the requirements set out in the NPPF, the Council, working in partnership with Sport England, commissioned the consultants Knight, Kavanagh & Page (KKP) in November 2015 to prepare an Active Place Strategy (APS) for Thurrock. The draft document prepared by KKP includes the following:

- Open Space and Play Areas Study
- Indoor and Built Sports Facilities Strategy
- Playing Pitch (and outdoor sport) Strategy
- Active Travel Strategy

The key focus of these reports is to provide an evidence base to help develop a strategy to provide an improved and expanded range of sporting and leisure opportunities to meet the needs of residents and to support funding bids to secure their delivery. The consultants' Technical Reports which were originally completed over the period 2016-2017 and subject to public consultation are currently being updated and will be used to inform the preparation of an overarching Open Space, Leisure and Recreation Strategy for Thurrock which will underpin the development of the Local Plan.

Thurrock has a population of 163,270 (2014 estimate) which is anticipated to increase by 25.5% (40,000) over the plan period to 2037 and this, together with the changing demographic structure of the population, will have significant implications for the Council in terms of the scale and distribution of new housing development and the nature and location of new open space, sports and leisure facilities.

QUESTION 36:

- a) What should be the priority locations for new or improved open space and sporting or leisure development?
- b) How can the Local Plan support the future viability, development and success of Thurrock's sports clubs at all levels through the development of new or improved facilities? and
- c) What opportunities exist for cross-boundary collaboration in the development or delivery of new open space, sporting or leisure opportunities?

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 28. 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 28: Active Design Principles

QUESTION 37:

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 38:

Should the Council seek to require a Health Impacts 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 39:

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.



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