

# Southend-on-Sea Borough Council

Agenda  
Item No.

Report of Corporate Director for  
Place

to

Cabinet

on

28<sup>th</sup> June 2016

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Strategic Planning

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## Preparation of New Southend Local Plan for Southend on Sea

Place Scrutiny Committee  
Executive Councillor: Councillor Flewitt  
Part 1 (Public Agenda Item)

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### 1. Purpose of Report

- 1.1 To seek Member endorsement for the preparation of a new Local Plan for Southend on Sea, which will include long term housing targets, which will replace, once adopted, the Southend on Sea Core Strategy (2007) and supersede associated local development documents.
- 1.2 To outline the recent changes to national policy which have increased the need to commence early preparation of a Local Plan and endorse financial support for this.
- 1.3 To outline a list of key evidence base documents, which may need to be produced by Southend Borough Council to support the preparation of a new Local Plan.
- 1.4 To seek Member agreement to delegate authority to the Corporate Director for Place in consultation with the Executive Councillor for Planning and Housing to make necessary amendments which may be required, and agree a draft Local Plan and associated documentation for all statutory public consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) 2012 Regulations "the 2012 Regulations".

### 2 Recommendations

- 2.1 **That Members agree preparation of the new Southend on Sea Local Plan as a corporate priority, which will provide a positive planning framework to manage and guide regeneration and development in Southend on Sea over at least the next 15 year period.**
- 2.2 **That Members note that preparation of a new Local Plan for Southend on Sea, which will include a financial and human resource commitment on**

**behalf of the Council to facilitate delivery of a robust, long term strategic planning policy document, in a timely manner.**

- 2.3 That Members note that the new Southend on Sea Local Plan will replace, once adopted, the Core Strategy and associated local development documents, where indicated.**
- 2.4 That Members agree that a number of key evidence based documents be produced to support preparation of the new Southend on Sea Local Plan, including an environmental constraints and green belt review at an early stage.**
- 2.5 That Members agree to delegate authority to the Corporate Director for Place in consultation with the Executive Councillor for Housing, Planning and Public Protection to make necessary amendments which may be required, and agree a draft Local Plan and associated documentation for all statutory public consultation under Regulation 18 of the Town and Country Planning Regulations (Local Planning) (England) 2012.**

### **3 Background**

#### **The Importance of the Development Plan**

- 3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the adopted development plan unless material considerations indicate otherwise.
- 3.2 In March 2012 the Coalition government published the National Planning Policy Framework (NPPF). The NPPF sets out the Government's planning policies for England and Wales. The NPPF must be taken into account in the preparation of local planning documents and is a material consideration in all planning decisions. The NPPF does not change the statutory status of the development plan as the starting point for decision making.
- 3.3 The NPPF stresses the importance of having a planning system that is plan led. It states that due weight should be given to relevant policies in existing plans according to their degree of consistency with the NPPF. Paragraph 14 sets out a presumption in favour of sustainable development which means approving development proposals that accord with this development plan without delay; and where the development plan is absent, silent or the relevant policies are out of date, granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, which assessed against the framework; or specific policies in the framework indicate development should be restricted.
- 3.4 The importance of the development plan has recently been emphasised in the Government's 'Productivity Plan' which was published as part of the July 2015 Budget. In relation to planning powers, the Plan states that it is vital that local authorities use their powers to put in place local plans that set the framework for the homes and jobs local people need. It stated that Government would take further action to ensure that local authorities put local plans in place a set

deadline. The Secretary of State for Communities and Local Government will intervene for those local authorities that do not produce a local plan.

### **The Existing Development Plan for Southend on Sea**

- 3.5 For the purposes of Section 38 of the Planning and Compulsory Purchase Act 2004, the adopted Development Plan for Southend on Sea currently comprises:
- Southend on Sea Core Strategy (December 2007)
  - London Southend and Environs Joint Area Action Plan (JAAP) (December 2014)
  - Southend on Sea Development Management Document (July 2015)
  - Essex County Council and Southend-on-Sea Borough Council Waste Local Plan (September 2001)
  - Southend on Sea Borough Local Plan Saved Policies – (Adopted 1994)
  - Southend Central Area Action Plan (SCAAP) Preferred Approach (December 2015)
- 3.6 The Southend on Sea Borough Local Plan was adopted in 1994, and a number of its policies were saved in 2007 to ensure that they remained part of the development plan prior to the adoption of a new plan. Some of these were replaced by the Southend on Sea Core Strategy and Development Management Document, but a number of them still remain valid.

### **Existing Development Plan Status and the need to prepare a new Local Plan for Southend on Sea**

- 3.7 Southend-on-Sea has an adopted Core Strategy Development Plan Document (DPD1). Policy KP1 of the Core Strategy sets out the Council's spatial strategy relating to growth. The primary focus for regeneration and growth within Southend is the Town Centre and Central Area, with appropriate additional regeneration and growth being focussed on the seafront and Shoeburyness.
- 3.8 The Core Strategy sets out the strategic priorities, including delivery of housing in Southend to 2021. This housing demand was tested at the strategic level before an allocation for the period (2001 to 2021) was agreed for Southend by a planning inspector, taking account of any adverse impacts and protected sites, as well as moderating it against other relevant constraints. This is consistent with the approach outlined in the NPPF. National Planning Practice Guidance (NPPG) acknowledges in paragraph 036 (Reference ID: 3-036-20140306) that 'housing requirement is set at the starting point of the plan, which can be earlier than the date the plan is adopted', as was the case with the Core Strategy.
- 3.9 The Core Strategy preferred approach was selected by the community above all other reasonable alternatives; this being to deliver regeneration of the existing urban area with a focus on the town centre, where a significant proportion of housing would be delivered over the plan period. The delivery of a significant portion of this housing is being taken forward through the Southend Central Area Action Plan (SCAAP). In addition, saved policies in the Borough Local Plan include proposals sites for delivery of housing both within the central area and wider Southend.

- 3.10 The Southend on Sea Borough Local Plan saved policies pre-date the existing planning system and the NPPF. Even so, it is still applied alongside the post-NPPF Southend Development Management Document and JAAP and the Core Strategy. As such the plans remain the principle documents of the Development Plan for the Borough. Recent case law has acknowledged that it would be unreasonable to expect all the planning documents of a Council to provide a seamless comprehensive and continuously up-to-date palette of planning policies and proposals (*Oxted Residential Ltd v Tandridge District Council [2015] EWHC 793*).
- 3.11 The NPPF also states in paragraph 211 that “for the purposes of decision-taking, the policies in the Local Plan should not be considered out of date simply because they were adopted prior to the publication of this Framework [in March 2012]”. The Council considers that the policies within the Core Strategy are consistent with the NPPF, seeking to deliver sustainable development that reflect the vision and aspirations of the local communities and was prepared using adequate, up to date and relevant evidence about economic, social and environmental characteristics and prospects of the area. Nevertheless, it is acknowledge and in line with Government policy there is still a need to review and update these policies where necessary, to ensure that they meet the sustainable development needs of the Borough beyond 2021.

*Government’s aim to get Local Plans in Place*

- 3.12 A Written Statement on Local Plans made by Brandon Lewis (Minister of State for Housing and Planning) in July 2015 stated that the Government will use sanctions, if required, to intervene where local planning authorities are not making sufficient progress in preparing new local plans. It states:

*“we will publish league tables setting out local authorities’ progress on their Local Plans. In cases where no local plan has been produced by early 2017 – five years after the publication of the NPPF – we will intervene to arrange for the Plan to be written, in consultation with local people, to accelerate production of a Local Plan”.*

- 3.13 The strong implication, because to date there has not been a full clarification, is that by the end of March 2017 Local Plans need to be at least at the second statutory stage of the Local Plan examination process – known as ‘Submission stage’. This is the point at which the Local Plan may be deemed to have been ‘written’ by the local planning authority, though it will still be subject to an examination in public by an independent planning inspector.
- 3.14 It is clear that the Government is serious in its intent to ensure that Local Plan coverage is maximised as soon as possible. The Prime Minister’s announcements in October 2015 reiterated and reinforced previous Government announcements on the importance of Local Plans being in place to provide certainty for local communities on the locations for significant housing growth to support economic development.
- 3.15 The Housing and Planning Act (2016), currently at the committee stage in the House of Lords, contains measures that would allow the Secretary of State to require a local authority to produce a plan or fund its preparation, as part of an

intervention where no plan has been produced by early 2017. However, significantly, the Bill does not specify the circumstances in which this would happen. Even so, the imperative is for local planning authorities to take pragmatic steps to ensure that their Local Plan is progressed to a certain point by March 2017.

- 3.16 The Government's timetable for producing Local Plans does, however, offer some flexibility in the content and scope of the Local Plan. Local planning authorities are encouraged to make progress with Local Plans that meet the key criteria of the NPPF, but can commit to an early review of a consequently adopted Local Plan to enable, for example, further site allocations that contribute to meeting the objectively assessed needs for the area over a longer time period to be considered and tested through the plan-led process. To this effect, the Brandon Lewis' Written Statement included the following paragraph:

*"As we have made clear in planning guidance a commitment to an early review of a Local Plan may be appropriate as a way of ensuring that a Local Plan is not unnecessarily delayed by seeking to resolve matters which are not critical to the plan's soundness or legal competence as a whole. The Planning Advisory Service has published a note on where Local Plans have been found sound, subject to early review, which local authorities should consider."*

- 3.17 Interestingly, the Ministerial Statement also reveals that:

*"Since the Planning and Compulsory Purchase Act 2004, local authorities have had more than a decade to produce a Local Plan. Most have done so – 82 per cent of authorities have published a Local Plan. Action is required to ensure that all local authorities meet the standards already achieved by the best."*

If 82% of authorities that have published Local Plans, in the absence of further clarity, it may well be that the adoption of the Core Strategy has already ensured that the Southend Borough Council has produced a Local Plan by early 2017. However, in any event, the Core Strategy, along with the other components of the current Development Plan may not be considered to be fully NPPF compliant in the future and therefore its replacement by a new Local Plan is still necessary.

### **Scope of the Southend on Sea new Local Plan**

- 3.18 A local plan is a statutory policy document that sets out the spatial strategy and policies for a local authority to address housing supply, including the delivery of affordable housing; support growth in jobs and business; regenerate and encourage investment in the town centres and other areas; deliver supporting infrastructure (such as public transport, utilities, school places, health and other community facilities and space for leisure and recreation); achieve the highest quality in design and conservation of the built environment; protect and enhance residential amenity; and support the principles of sustainable development, including adaptation to, and mitigation of, climate change. The process for preparation of the Local Plan is set out in legislation (see **Appendix A** for a diagrammatic illustration of the planning process from preparation to adoption).

The National Planning Policy Guidance (NPPG) states that a Local Plan should make it clear **what** is intended to happen in the area over the life of the plan, **where** and **when** this will occur and **how** it will be delivered. Local plans should be tailored to the needs of each area in terms of their strategy and the policies required. Plans should focus on the key issues that need to be addressed and be aspirational, but also realistic and deliverable in what is proposed. In essence, the main scope of the plan should be as follows:

- site specific allocations including residential and employment uses;
- detailed development management policies against which planning applications will be determined;
- identification, phasing and implementation of local infrastructure;
- boundaries of retail centres;
- historic conservation, open space and nature conservation policies and designations; and
- policies map.

3.19 The NPPF makes clear that the Government's preferred approach is for each local planning authority to prepare a single Local Plan for its area (or a joint document with neighbouring areas) rather than a suite of documents, as with the existing Local Development Framework (now collective known as a 'Local Plan'). While additional local plans can be produced, for example, a separate site allocations document or Area Action Plan, there should be a clear justification for doing so.

#### *Planning for Housing*

3.20 A key objective of the NPPF is to 'boost significantly the supply of housing'. In undertaking reviews of housing need local authorities must now base their assessment of future needs on the most recent and up-to-date population, household and demographic information produced by Office of National Statistics (ONS)

The 2012 sub-national household projections (SNHP) were released in February 2015, representing a new official dataset published by the Department for Communities and Local Government. This forms, according to the NPPG, the 'starting point' for assessing housing need. The NPPG also suggests that this 'starting point' may require adjustment, based on factors affecting local demography and household formation rates.

3.21 Table 1 shows the projected growth in population and households across Thames Gateway South Essex (TGSE) and for each constituent authority. This shows change over the period from 2014 to 2037.

**Table 1: 2012 Population and Household Projections 2014 – 2037 (DCLG)**

	Change 2014-2037		Households	%	Average per year	
	Population	%			NetMigration	Dwellings
Basildon	26,766	15.0%	14,900	19.9%	351	659
Castle Point	10,327	11.6%	6,368	17.1%	702	286
Rochford	10,560	12.5%	5,934	17.3%	474	265
Southend-on-Sea	30,394	17.2%	18,528	24.1%	841	848
Thurrock	37,511	23.1%	18,586	28.8%	396	828
<b>TGSE</b>	<b>115,558</b>	<b>16.7%</b>	<b>64,316</b>	<b>22.4%</b>	<b>2,764</b>	<b>2,886</b>

Source: Edge Analytics

3.22 Across TGSE, it is evident that the 2012-based projections expect considerable growth in both population and households. The scale of population growth (16.7%) is higher than projected growth of 14.6% for England, with the 22.4% growth in households in TGSE also comparable to the projected growth rate of 21.3% for England.

3.23 These projections form the ‘starting point’ to assist with identification of an ‘objectively assessed need’ (OAN) figure and a Strategic Housing Market Assessment (SHMA). One is being prepared for South Essex authorities, will establish the OAN figure for TGSE and each constituent authority, in line with policy and guidance in the NPPF and NPPG.

3.24 NPPF in paragraph 14, states that:

*“Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to change unless:*

- *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
- *specific policies in this Framework indicate development should be restricted.*

3.25 The NPPG reveals that there is a clear distinction between the ‘objective assessment of need’ and the development of planning policy housing targets. As such it states that:

*“The assessment of development needs is an objective assessment of need based on facts and unbiased evidence. Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints. However, these considerations will need to be addressed when bringing evidence bases together to identify specific policies within development plans”.*

3.26 Establishing a future need for all housing is not an exact science. The OAN is essentially a technical exercise which may be a single figure, or it may be a minimum-maximum range – which if possible should include a preferred figure. Either way, the evidence base should set out the main uncertainties behind the assessed housing need and how they may be resolved through monitoring and

future plan reviews. It is vitally important that the OAN is not constrained or reduced/ manipulated artificially as this would result in unsound plans and grounds for appeal.

- 3.27 **The plan's housing target, or 'requirement', will not necessarily equal the OAN.** Three considerations come between the OAN and the target, as set out below. These are essentially determined by the plan making process, involving key stakeholders, the community and in co-operation with neighbouring authorities:
- the area's deliverability and sustainable supply capacity (this may include the availability of sites and examination of the Green Belt and other constraints);
  - cross-boundary unmet need; and
  - the authority's wider policy objectives, e.g. higher job growth (Nb. This factor can only be used to increase OAN).

*Risks associated with not planning for housing*

- 3.28 National policy and guidance states that local planning authorities should have an identified five-year housing supply at all points during a plan period. Housing requirement figures in up-to-date adopted Local Plans should be used as the starting point for calculating the five year supply. It reveals that considerable weight should be given to the housing requirement figures in adopted Local Plans, which have successfully passed through the examination process, unless significant new evidence comes to light. Even so, evidence which dates back several years, such as that drawn from revoked regional strategies, may not adequately reflect current needs. (NPPG; Paragraph: 030; ID: 3-030-20140306).
- 3.29 Without an up-to-date and demonstrable 5 year housing land supply, the total number (and location) of houses to be developed in an area may be taken out of the control of the local authority, as described in paragraph 14 of NPPF, leading to a situation where there is 'planning by appeal'. This may also make it more difficult for the Council to apply other adopted planning policies.
- 3.30 Nevertheless, importantly for Southend, national guidance outlines that 'Unmet housing need is unlikely to outweigh the harm to the Green Belt and other harm to constitute the "very special circumstances" justifying inappropriate development on a site within the Green Belt.' (Paragraph: 034 Reference ID: 3-034-20140306) However, as part of the plan making process, the appropriateness of the current green belt should be examined to understand if it still fulfils its policy objectives, especially if the Council is unable to meet a large proportion of its identified OAN.

**Duty to Co-operate: Policy and Legislative Framework**

- 3.31 The NPPF states that local authorities have a 'Duty to Co-operate' (DtC) on planning issues that cross administrative boundaries. The Planning and Compulsory Purchase Act (2004) also requires local authorities to engage constructively with neighbours.
- 3.32 The NPPF states that the required outcome of the DtC is that, through this constructive process, it should enable:



“Local planning authorities to work together to meet development requirements which cannot be met within their own areas”.

- 3.33 The DtC is not a duty to agree. However, 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. This includes member level co-operation.
- 3.34 In respect of housing, the NPPF makes clear that local planning authorities should meet their own housing need and meet the needs of other authorities in the same housing market area, as far as is consistent with the policies set out in the NPPF (i.e. there is sustainable capacity to do so). However, local planning authorities are not obliged to accept the unmet needs of other planning authorities if they have robust evidence that this would be inconsistent with the policies set out in the NPPF, for example, green belt policies or other environmental constraints. These constraints should be examined robustly and transparently as part of a Councils evidence base, particularly if a Council is unable to meet a large proportion of its OAN.

### **Statutory Requirements and Stages in new Local Plan Preparation**

- 3.35 It is a statutory requirement for the Local Plan to be prepared in accordance with the relevant primary and secondary legislation i.e. the Planning and Compulsory Purchase Act 2004, as amended, and the Town and Country Planning (Local Development) (England) Regulations 2012, as amended. These regulations prescribe the form and content of plans and the procedure to be followed in their preparation. The Regulations set out the statutory stages including the nature of public participation and the requirements for publications and submission of documents, including the length of the representations period (**See Appendix A**).

### **Evidence Base**

- 3.36 Appropriate and proportionate evidence is essential for producing a sound local plan, and paragraph 158 onwards of the NPPF sets out the types of evidence that may be required by topic. NPPG provides more detailed guidance on evidence base. It is not a prescriptive list; the evidence should be focused tightly on supporting and justifying particular policies in the Local Plan. The evidence base required for each Local Plan will vary depending on the scope of the Plan and the nature of the local area. Evidence of cooperation under the legal undertaking of DtC and consideration of different options, which is assessed by sustainability appraisal, for meeting development needs are also important for the process, especially at examination in public.
- 3.37 A list of technical evidence which may be required includes *inter alia*:
- Economic Development Assessment
  - Employment Land Review
  - Strategic Housing Land Availability Assessment
  - Strategic Housing Market Assessment
  - Call for Sites including Assessment of Site Viability

- Heritage Study (and Character Assessment)
- Landscape (Green Belt) and Visual Impact Assessment
- Town Centre and Retail Study
- Strategic Flood Risk Assessment
- Whole Plan Viability Assessment
- Equalities Impact Assessment
- Habitats Regulations Assessment
- Sustainability Assessment/Strategic Environmental Assessment
- Revised Community Infrastructure Levy
- Statement of Community Involvement
- Gypsy, Traveller and Showpeople Assessment
- Infrastructure Delivery Plan (including transport and Green)
- Car Parking Study and Strategy

## **Conclusion**

- 3.38 It is essential the Council commences preparation of a Southend Local Plan to ensure its housing targets are 'up-to-date', in conformity with new government guidance, and the Council can effectively monitor housing delivery and regularly update its 5 year land supply position. Failure to do so may result in planning decisions being taken out of the Councils hands, as decisions are determined through the appeal system.
- 3.39 There will be added complexity to the plan making process when a new OAN is defined for Southend as part of the TGSE SHMA. It may be argued that this should form the basis of our 5 year supply target, prior to a new Local Plan being adopted. This OAN for Southend is likely to be very challenging to meet as it does not consider any applicable local constraints. However, the Council would contend that the existing Core Strategy housing targets represent the current identified sustainable capacity of Southend until the plan is formally reviewed.

## **4. Other Options**

- 4.1 A failure to undertake preparation of a new Local Plan would result in the Council becoming increasingly unable to positively influence the scale, nature and location of change within Southend on Sea. This would lead to the potential increase in the risk of "planning by appeal" with the responsibility for decision making in effect being passed from the Council and the local community to both the Planning Inspectorate and the Secretary of State. It would also likely that the Council would also incur increasing costs in attempting to defend refusals of planning permission based on an increasingly older Core Strategy and evidence base.
- 4.2 The preparation of a new Southend on Sea Local Plan is the only option which would allow for the proper consideration of a range of spatial options and policies which address more recent changes in national and regional planning policy, including the need to identify land to meet future housing and employment land requirements.

## **5. Reasons for Recommendations**

- 5.1 To ensure the expeditious production of a new Local Plan for Southend on Sea and associated evidence base to manage and guide future growth and development in Southend on Sea in a positive and timely manner, where the Council has control of decision making in the public interest as representatives of the local community.

## **6. Corporate Implications**

### **6.1 Contribution to Council's Vision & Corporate Priorities**

The successful delivery of the Local Plan will contribute to the fulfilment of a significant number of spatial elements of the Council's vision and priorities as laid down in The Southend-on-Sea Community Plan 2010-2020, for example, in relation to town centre and central seafront regeneration, and improving economic prosperity, health, education, green space, design, flood risk among others.

### **6.2 Financial Implications**

Financial input is necessary to fulfil the requirements of all statutory stages in the preparation and delivery of the Local Plan. It should be noted that taking a development plan document through to adoption does have significant financial implications owing to the statutory process which has to be adhered to.

It is anticipated that the Local Plan Review will take three years to progress to adoption. It will be necessary to provide a bespoke budget for the work. Because it is not established at this early stage the extent of the commitment it is proposed to prepare a business case on an annual basis until more detailed timetable and project plan has been prepared that would enable an overall budget to be set for the work.

### **6.3 Legal Implications**

To establish a housing target each local authority will need to engage under the Duty to Co-operate in the Localism Act.

It places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an on-going 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.

The status of a Local Plan is prescribed in Section 38(6) of the Planning and Compulsory Purchase Act 2004 which gives primacy to the development plan. It states:

“If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.”

As such having an up to date Local Plan in place allows the local authority to plan positively and direct development to those sites and locations that are in accordance with the Council Strategy for regeneration and growth. It will provide the authority with the framework to robustly defend planning decisions at appeal.

#### 6.4 People Implications

Significant staff resources from the Strategic Planning Team will be required in order to produce the Local Plan. Support from the Department of Place Business Support Unit will also be required particularly with regards to the public consultation.

#### 6.5 Property Implications

A new Local Plan will provide planning policy for all land in the Borough, including Council owned assets.

#### 6.6 Consultation

One of the key elements of the local planning system is the recognition of the need for the earliest and fullest community involvement in the preparation of new planning documents. The local plan will be subject to statutory consultation under the Regulation 17 and 18 of the 2012 Regulations. In addition it will be subject to an examination in public held by an independent government appointment planning inspector to consider when it is ‘sound’ and may be put forward for adoption by the Council.

#### 6.7 Equalities and Diversity Implications

An equalities impact assessment will be produced for the Local Plan. The public consultation will give the opportunity for different sections of the community to input into the plan making process.

The consultation process will be carried out in accordance with the Council’s Statement of Community Involvement (2013).

## 6.8 Risk Assessment

The Timetable for Local Plan preparation is challenging. Significant staff resources within the Planning Group will be required in order to take forward the Plan through its examination stages (as well as the Southend Central Area Action Plan (SCAAP) and Southend and Essex Waste Plan which are on-going).

If this Local Plan were not to be published and taken forward to adoption, the absence of the planning policies may result in inappropriate development taking place within the local authority area and there would be a potential impact on the green belt to meet future housing supply, if the Government guidance changes in the coming years towards its protection. In addition there would be no policy to manage strategically the development of key sites and infrastructure, as well as having adopted planning policy to help secure Government and European funding such as has been achieved for the London Southend Airport and Environs Joint Area Action Plan (JAAP) and SCAAP.

## 6.9 Value for Money

It is believed that there will be significant beneficial impacts on value for money, by carrying out the work proposed using in-house resources wherever possible. It will bring significant benefits in terms of experience and expertise which would not be gained otherwise.

It will also provide adopted planning policies which may be used to promote applications funding from Government and European sources, to help deliver needed infrastructure in the borough.

## 6.10 Community Safety Implications

The Local Plan will seek to improve the natural and built environment (including designing out crime in development and the public realm) thereby contributing towards improving community safety.

## 6.11 Environmental Impact

### *Sustainability Appraisal*

A Sustainability Appraisal is an assessment of the potential significant social, environmental and economic impacts of development and forms an integral part of the plan making process. It ensures that all policies and proposals are prepared with a view to contributing to the achievement of sustainable development. This appraisal has been used to assist decision-making and identification of the most sustainable policies to take forward.

### *Habitats Regulations Screening Report*

Southend-on-Sea and the surrounding districts are home to a number of important designated sites for nature conservation. Habitats screening is an assessment of the potential significant effects of a policy on European Sites designated for their nature conservation importance. These include Special

Areas of Conservation, Special Protection Areas, and international Ramsar sites. A policy should only be approved after determining that it will not adversely affect the integrity of such sites. Each policy has been assessed for any significant impacts on European sites within or outside the Southend-on-Sea.

## **7. Background Papers**

- 7.1 The Town and Country Planning (Local Development) (England) Regulations 2012.
- 7.2 Planning and Compulsory Purchase Act 2004.
- 7.3 Ten key principles for owning your housing number- finding your objectively assessed needs (April 2013).
- 7.4 Planning Practice Guidance.
- 7.5 Localism Act 2011.
- 7.6 National Planning Policy Framework (2012).
- 7.7 Housing and Planning Act (2016).

## **8. Appendices**

### **Appendix A – Diagrammatic Illustration of Plan Preparation Process**