# SOUTHEND ON SEA BOROUGH COUNCIL

# Sustainability Appraisal of the Development Management Policies Development Plan Document Issues and Options

June 2010



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## 1 Introduction

#### The sustainability appraisal

- 1.1 This is the initial written report for the sustainability appraisal (SA) of the Development Management Policies Development Plan Document (DPD) for Southend-on-Sea. The DPD is being prepared with the purpose of preparing a set of detailed policies to guide delivery of development in the Southend-on-Sea Borough.
- 1.2 The DPD is also being produced by Southend-on-Sea Borough Council as part of the Local Development Framework (LDF). The purpose of this SA report is to set out the range of information that it is proposed to take into account in the SA of the DPD. As this is a consultation document the scope of information is not yet set and the input of respondents is welcomed to ensure full coverage of sustainability issues.
- 1.3 This SA report builds on work already completed for the SA of the Core Strategy DPD, which was adopted in December 2007. The aim is to keep the scope focused on those issues that this DPD could influence and be influenced by. The SA report accompanying the submission version of the Core Strategy should be read in a conjunction with this SA report.
- 1.4 One of the main outputs of this scoping process will be a set of sustainability objectives. These objectives form a definition of sustainability that provides a consistent basis for the appraisal of the emerging DPD, the site selection criteria and the policy principles. These are set out in section 5.
- 1.5 The sustainability framework is developed from a review of the policy and the objectives of other plans and strategies relevant to the topic. Also, the scoping stage includes gathering social, economic and environmental information to identify what the main issues may be for sustainable development in the area.
- 1.6 The SA of the LDF is being prepared in order to fulfil the statutory requirement from the Planning and Compulsory Purchase Act 2004, including the requirements set out for sustainability appraisal in paragraphs 4.39 to 4.43 of Planning Policy Statement 12: Local Spatial Planning (2008). However, regardless of statutory requirements the main purpose of the SA is to help create a better plan and one that takes full account of the potential for impacts on sustainable development. This aims to avoid and mitigate the potential for adverse impacts and maximise the benefits for greater sustainability.

### **Habitats Regulations Assessment**

1.7 In light of the European Habitats Directive and the 'Conservation (Natural Habitats, Etc) (Amendment) (England and Wales) Regulations 2006', a brief assessment screening was undertaken of the submission Core Strategy DPD. This ascertained whether the Core Strategy is likely to have an adverse effect on the integrity of any European or international site, either alone or in combination with other relevant plans or projects.

1.8 Further work on Habitats Assessment will be required in developing the policies for Southend in each DPD, to make sure there are no adverse impacts on the protected sites.

#### The Local Development Framework

- 1.9 This Development Management DPD was not part of the original schedule of contents of the Local Development Framework (LDF). However, as preparation progressed on other DPDs and Area Action Plans (AAP) the Council decided it was necessary to prepare a further set of policies to support those in the Core Strategy and help deliver more sustainable development.
- 1.10 Sustainability appraisals are being undertaken of the whole LDF, with SAs already undertaken of all component LDF documents to date, these have reached various stage of completion, they are:
  - the Core Strategy Development Plan Document
  - the Planning Obligations Supplementary Plan Document
  - Design and Townscape Guide Supplementary Planning Document
- 1.11 The SA of the Southend-on-Sea Central Area AAP is also underway.

# 2 The sustainability appraisal process

- 2.1 The purpose of this stage of the sustainability appraisal is to identify what the sustainability issues are in delivering sustainable development in Southend-on-Sea. These are identified from a review of baseline information and by looking at the sustainability objectives of other plans and strategies.
- 2.2 Following this review of background the SA needs to assess the emerging policies of the DPD, contained in the Issues and Options DPD, to find how these are likely to impact on implementing development that will contribute to greater sustainability.
- 2.3 The first stage of the appraisal is gathering baseline information on the characteristics of the area (section 3) and identifying the other plans and programmes relevant of the SA of the area (section 4). From these sources and the SA work completed for the Core Strategy a set of sustainability objectives are drawn up. These objectives provide the definition of sustainable development relating to the DPD giving a consistent basis for the appraisal (section 5).
- An appraisal of all the suggested policies in the Issues and Options version is in Appendix 1. This sustainability appraisal report summarises the main findings and recommendations of the policy appraisal (section 6). Relationship of the Development Management DPD to the Core Strategy
- 2.5 The initial stage of information gathering for the sustainability appraisal (SA) builds on work already undertaken for the SA of the Southend-on-Sea LDF Core Strategy, reported in August 2006.
- 2.6 The Development Management DPD provides the detailed implementation policies for the LDF. However, the Core Strategy also contained policies that will used in making development management decisions. The Core Strategy contained two types of policies, strategic principles of delivering development in the Borough in the 'Key Policies' and more detailed or area specific 'Core Policies'. The SA of the Core Strategy contains a full sustainability appraisal of these policies.
- 2.7 The Development Management policies of this new DPD need to fill in the gaps that remain in the Core Strategy policies. There is no need for the Development Management policies to repeat policy issues from the Core Strategy. Instead, these policies need to add the necessary detail to the plan to ensure that the local situation is taken into account, and the type and design of development helps respond to the particular needs of the Borough.
- 2.8 For the sustainability appraisal this means it is not necessary for the Development Management policies to have full coverage of all sustainability issues, as some matters will be dealt with through the Core Strategy.

#### Collation of baseline information

- 2.9 The baseline data for the SA of the Development Management DPD has been selected specifically to inform the SA of this DPD. The DPD covers the whole plan area, although in some cases refers specifically to certain areas. Therefore, the broad coverage of issues in the baseline is in sufficient detail for the SA of this type of plan. However, as the Development Management DPD contains policies specifically relating to the Seafront, baseline information has been collected in greater detail for this area.
- 2.10 The baseline draws on work carried out by Southend-on-Sea Borough Council (SBC) during the preparation of the plan and work carried out for the SA of the Core Strategy. The SA scoping document prepared for the Core Strategy provides more coverage of the process of scoping and background material gathering for the SA<sup>1</sup>.
- 2.11 The primary sources of information for the baseline data collation are:
  - Southend-on-Sea Town Centre Area Action Plan Key Statistics, SBC
  - Town Centre Area Actions Plan Issues and Options paper, SBC
  - Baker Associates, Sustainability Appraisal, for Southend on Sea, Local Development Framework, Core Strategy Development Plan Document, SBC
- 2.12 In addition, relevant plans and programmes containing sustainability objectives or goals that will be important influences on the SA and DPD have also been identified. Again, these are referenced from those identified by those producing the DPD, as well as those identified in the SA of the Core Strategy. In identifying the relevant plans and programmes it has been important to restrict this to those plans and programmes with real relevance to the DPD.
- 2.13 The baseline information descriptions and identification of key sustainability issues is shown in Section 4.

#### Sustainability appraisal process

- 2.14 The SA of the DPD will be a continual process during preparation from this early stage up to submission. .
- 2.15 At this stage in DPD preparation it is necessary to consider the sustainability impacts for the suggested preferred policies of the Issues and Option draft. The purpose is to ensure sustainability considerations can be taken into account in policy coverage and wording at an early opportunity.
- 2.16 This SA provides an opportunity for appraising the emerging policy options. The consideration of alternatives and identifying of the relative sustainability impacts of these approaches is an important part of the SA processes, as well as an SEA requirement. At this early stage the alternatives, or options, presented are very broad with decisions still to be made about the type and number of policies to be included.

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<sup>&</sup>lt;sup>1</sup> See also 'The Habitats Regulations Assessment' of the Core Strategy DPD also available on Southend on Sea Borough Council website

- 2.17 Parts of the evidence base for the DPD are still under preparation, such as characterisation of the built environment. These will need to feed into plan making in moving to submission stage and may raise sustainability issues. Where appropriate public consultation on these plans will help make sure proposed schemes are supported by the public.
- 2.18 It will also be necessary to consider assessment as required by the Habitats Directive (1995) as part of the appraisal process of the LDF. It is already recognised in the appraisal of the Core Strategy that the potential for the LDF to have an impact on protected sites. The impact of the DPD on these sites may need to be verified and documented in a Habitats Directive screening.
- 2.19 There are five European Sites relevant to the Local Development Framework. They are:
  - a) Benfleet and Southend Marshes SPA;
  - b) Foulness SPA;
  - c) Essex Estuaries SPA; and
  - d) Crouch and Road Estuaries SPA; and
  - e) Thames Estuary & Marshes SPA.

#### **Timetable**

2.20 The timetable for the SA work is entirely directed by the programme by which the DPD is prepared and goes through successive stages of consultation, development, examination and adoption.

# 3 Other plans and strategies

- 3.1 A more comprehensive summary of other relevant plans and programmes can be found in the Issues and Options and Core Strategy SA Report. This section is intended to draw out the specific issues relating to the DPD.
- 3.2 The Habitats Directive and Conservation (Natural Habitats &c) Regulations 1994 (as amended), have relevance to the DPD. This is because the Borough is surrounded by areas designated as being of international significance for nature conservation. These designated areas are collectively known under European legislation as Natura 2000 sites. Any potential impact of planning policy, or specific proposals, on these areas needs assessment to determine the nature of these impacts to ensure that they will mitigate or avoid completely harm to the designated features on the site.
- 3.3 National planning policy is set out as Planning Policy Statements/Guidance<sup>2</sup>. These will need to be taken into account in the DPD and SA, and form the basis for development management decisions nationally.
- 3.4 **PPS1: Delivery of sustainable development** sets the principles for delivering all new development, with the presumption in favour of delivering more sustainable development. There is also a new PPS 'Planning for a Low Carbon Future in a Changing Climate', consultation on an initial draft ended June 2010. This will combine planning policy on climate change and planning policy on new development into one.
- 3.5 PPS4: Planning for sustainable economic growth (2009) stipulates the need to ensure that employment needs are based on a strong evidence base. To deliver more sustainable economic growth the PPS calls for positive planning of growth sector clusters. Development Management policies and Area Action Plans can provide the context for this type of policy. A specific policy of the PPS, EC3, deals with planning for centres. At a local level this policy calls for residential or office development above ground floor retail, leisure or other facilities within centres. Also, plans should identify sites or buildings within existing centres suitable for development, conversion or change of use.
- 3.6 Policy EC4 covers planning for consumer choice and promoting competitive town centres, including planning for a diverse range of uses throughout centres. For retail development a strong mix is encouraged, recognising the importance of smaller shops to enhance the character and vibrancy of centres. Of relevance to plans for Southend centre the PPS states existing markets should be retained and enhanced, where appropriate. Overall plans for the town centres should aim to 'enhance the established character and diversity of their town centre.' Overall, there is also the need to ensure development in main urban centres does not adversely impact on the economy of other nearby centres. It should be noted that PPS4 (2009) replaces for former town centre guidance on PPS6.

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<sup>&</sup>lt;sup>2</sup> Under the new government all national planning policy guidance is under review

- 3.7 The historic environment and archaeology are addressed in two PPGs. These are:
  - PPG15: Planning and the Historic Environment (1994), which stipulates the
    need for policies to protected designated structures and landscapes, including
    listed buildings, conservation areas, parks and gardens, battlefields and the
    historic landscape. There is also the need to protect the setting of listed
    buildings and enhancing conservation areas. This PPS is currently under review
    with consultation on revised version underway.
  - **PPG16: Archaeology and Planning** (1990), which states development needs should reconcile the need for development with the interests of conservation including archaeology, as these remains are finite and irreplaceable.
- 3.8 Nature conservation is addressed in **PPS9: Biodiversity and Geological Conservation** (2005), with the aim of planning to maintain, enhance and restore biodiversity conservation and geodiversity interest. Conservation and enhancement should be integrated into planning decisions.
- 3.9 **PPG20: Coastal Planning** (1992) is the national guidance note on coastal planning. Its primary aims are:
  - to protect the undeveloped coasts
  - managing appropriate development, particularly that which requires a coastal location
  - managing risk, including flooding and erosion, and
  - improving the environment particularly in urbanised or despoiled areas.
- 3.10 PPG20 recognises that the developed coast may provide opportunities for economic restructuring and regeneration of existing urban areas, thereby improving their appearance and environment. PPG20 notes that this approach can be particularly effective for buildings and areas of historic interest.
- 3.11 PPS9 and PPG20 (with PPS7: Sustainable Development in Rural Areas) are currently under review into a combined PPS. Consultation on the new PPS: 'Planning for a Natural and Healthy Environment', ended at the beginning of June 2010.
- 3.12 Other PPS are also important guides for development such as PPS1: Delivery Sustainable development. There is also a new PPS 'Planning for a Low Carbon Future in a Changing Climate', consultation on an initial draft ended June 2010. This will combine planning policy on climate change and planning policy on new development into one.
- 3.13 PPS25 Development and Flood Risk sets the controls for developing in flood prone areas. Much of the seafront of Southend suffers from the risk of flood. Although much of the full length of the seafront is protected by coastal sea defences, it remains at risk from breaches.
- 3.14 A more detailed practice guide was published to accompany this PPS in December 2009. The revised guidance includes more information on:
  - site-specific flood risk assessment, including the need for a proportionate approach

- Strategic Flood Risk Assessment;
- Application of the Sequential and Exception Tests, including 'what is safe' (safe access and egress in times of flood)
- surface water flood management, including sustainable drainage systems (SUDS).
- 3.15 The **Sustainable Communities** plan published in 2003, set out the Government's agenda for sustainable development and urban renaissance across England. As part of the plan the Urban White Paper outlined key growth areas in the north and south of the country. A key part of delivering this agenda is the planned development of four identified growth areas, the first priority being the growth of the Thames Gateway stretching along the Thames estuary from London to the sea and including Southendon-Sea.
- 3.16 This plan sets out an approach to creating new communities in the UK that provide sustainable places in which to live. The key aim of the approach is a step change in housing delivery increasing housing levels about the existing growth rate. These new homes will include homes to meet the needs of all groups, and be integrated with economic growth and provision of new services and greenspaces to create desirable places to live.
- 3.17 The **Thames Gateway** area is a co-ordinated effort to develop and regenerate fifteen local authority areas, across three regions along the Thames estuary and north Kent coast. Renaissance Southend Limited is an integral part of the overall strategy of regenerated polycentric retail and service centres. The role played by Southend-on-Sea and the south Essex sub area is reflected in the Regional Spatial Strategy and discussed in the Sustainability Appraisal of the Core Strategy.
- 3.18 Delivering development in the Thames Gateway, including the south Essex towns that make up part of it, are a key national objective, the economic and housing growth outlined in the Thames Gateway area should be supported by the LDF.
- 3.19 **Thames Gateway Strategic Partnership:** The Thames Gateway Strategic Partnership produced a document specifically for South Essex. This presents an 'opportunity for driving forward regeneration and achieving growth and prosperity in South Essex as a key part of Thames Gateway'. The material in this document has been reflected in the East of England Plan.
- 3.20 A Strategic Flood Risk Assessment, Water Cycle Study and Surface Water Management Plan are also being produced and as part of the background material defining and guiding land use planning in the Borough.
- 3.21 The **East of England Regional Spatial Strategy**<sup>3</sup> provides the direct planning context for the preparation of the LDF, setting out the role that Southend-on-Sea is expected to perform and its contribution to the region, the level of employment and housing

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<sup>&</sup>lt;sup>3</sup> The new government has proposed the abolition of RSS under the new Decentralisation and Localism Bill, at the time of writing this report it is not known what this will mean for existing RSS policy

- Baker Associates I Sustainability appraisal Development Management Policies DPD development that the LDF is to make provision for, and various objectives that the LDF is expected to contribute to.
- 3.22 The key objective for the sub-region is to achieve regeneration through jobs-led growth, higher levels of local economic performance and employment, and a more sustainable balance of local jobs and workers.
- 3.23 Policy SS5 in the RSS outlines town centre policy for the region. The RSS promotes the creation of 'thriving, vibrant' town centres, which will continue to be the focus of investment and regeneration. Each local authority should produce a strategy for each town centre to promote successful mixed use economies, manage change and support cultural heritage. Local Authorities should also protect and enhance existing neighbourhood centres.
- 3.24 The RSS outlines that local Planning Authorities and local agencies should work towards achieving the regeneration of coastal towns and communities and the conservation of the environment of the coast and coastal waters.
- 3.25 In the RSS Local Development Documents are expected to ensure that the in the region's coastal areas:
  - town centres continue to provide for local and visitor needs;
  - the interrelationship and linkages between town centres and leisure areas are facilitated for their mutual benefit; and
  - retailing in leisure areas where viable, so long as it does not adversely affect town centres.
- 3.26 Policies TG/SE1 sets out the major zones of change in the Thames Gateway/South Essex sub-region and this includes Southend Town centre as a 'cultural and intellectual hub and a higher education centre of excellence'. This includes specific provisions for upgrading the university campus (much of which is already complete or underway) and improving local passenger transport accessibility. The expected job and housing growth is also specified in the policy.
- 3.27 The **Community Strategy** and **SBC Corporate Plan** are both important parts of local policy. Under the new provision for making development plans as explained in PPS12: Local Spatial Planning 'The vision should be in general conformity with the RSS and it should closely relate to any Sustainable Community Strategy for the area'. (para. 4.2).
- 3.28 The Community Plan for Southend sets the vision for Southend-on-Sea as 'a vibrant coastal town and prosperous regional centre where people enjoy living, working and visiting'. This vision is to be achieved through inter-linked themes detailed in the plan.
  - prosperous community a prosperous local economy
  - learning community opportunities for learning for all and a highly skilled workforce
  - safer community crime, disorder and offending reduced
  - healthy community improved health and well-being

- environmentally aware community improved transport infrastructure and a quality environment
- supportive community better life chances for vulnerable people
- cultural community a cultural capital.
- 3.29 Key themes relating to the DPD includes; improving the centre and attracting conferences to the town, amongst 21 objectives.
- 3.30 Transport issues for the area are covered in the **Local Transport Plan 2** (2006-2011). This reinforces the approach set out in the RSS for the need for a high quality public transport infrastructure as part of creating the sustainable communities. The town centre in particular is the focus of many transport improvements in the Borough, including to the two stations within this area and the new Travel Centre. Drafting of LTP3 (2011-2026) has now begun. Aims of local transport plans includes making 'environmental rooms' of residential and mixed use neighbourhoods bounded by the main travel routes around the Borough. Also, the LTP has objective of 'smarter choices' to reduce people's reliance on car travel and use more sustainable alternatives.
- 3.31 The **Southend on Sea Core Strategy** is the overarching part of the LDF that has implications for the DPD. This contains policies that cover all development in the Borough, and sets goals for housing and job development in the town centre and sea front areas. It also has policies that cover the principles for development, covering issues such as the historic environment, use of resources and flooding. There are also more specific policies addressing matters in more detail; such as the design of development and delivering open space and recreation space requirements; the town centre; minerals; and community infrastructure.
- 3.32 Further information on the appraisal of the policies of the Core Strategy is in the SA of the Core Strategy available on the Southend-on-Sea website.
- 3.33 Other component parts of the LDF are of relevance to the DPD as well as additional SPD still to be prepared on Sustainable Transport and the Green Space and Green Grid Strategies for the Borough, and the Design Guidance. As well as the AAP being prepared for the Central Area and Airport.
- 3.34 **South Essex Green Grid Strategy:** this is a long-term project to deliver a network of open spaces and green links throughout Thames Gateway South Essex, as part of The Thames Gateway regeneration area. This aims to bring significant environmental improvements to this part of Essex, through the provision of combined recreational open spaces, wildlife corridors and improving the appearance of the landscape. The purpose of the Greengrid strategy is to:
  - Provide a holistic and long-term vision for the sustainable future development and management of the south Essex area
  - Define an environmental infrastructure that promotes the establishment and managements of appropriate character settings
  - Provide the context for development over the long term.

- 3.35 Therefore, the Greengrid strategy will have particular implications for the LDF by ensuring improvements to the 'green' character of the Borough are taken into account in a strategic way with long term planning for this change and how development can contribute to this.
- 3.36 A masterplan has been prepared for the regeneration and renewal of the town centre. This is the **Southend Central Area Masterplan** (consultation draft September 2007). The purpose of the masterplan is to set a vision for central Southend and the seafront, as part of the major scheme for Renaissance Southend. The aim is to:
  - act as a catalyst for realising the vision and objectives for the revitalisation of the area
  - to help develop confidence amongst landowners and therefore encourage investment
  - to help deliver civic pride.
- 3.37 Essex Coast and Estuaries Coastal Habitat Management Plan (CHaMP), 2002 this provides a long-term strategic view on how the balance of losses and gains to habitats and species of European interest can be maintained (particularly intertidal and freshwater habitats in the coastal zone). This is in light of rising sea levels, and the flood defence response to it. The CHaMP concluded that the estuaries cannot be maintained in their present form. Maintaining the present levels of flood defences will lead to the loss of significant areas of salt marsh by 2050. It was recognised that ecological change is inevitable due to changes in the distribution and extent of habitats under a sea level rise scenario.
- 3.38 However, these findings relate more to locations where defences are protecting agricultural land. Where flood defences are protecting urban areas, such as Southend, defences should be maintained.
- 3.39 Essex Sea Wall Strategy, 1998 The Essex Sea Wall Strategy was undertaken to ensure that the flood defences on the estuaries and open coast of Essex are managed in an integrated manner. The strategy was developed to look at the economic viability of the existing defences within each of a series of sectors of the shoreline, to address the environmental issues and habitat creation options, to review the requirements for hydraulic modelling and to identify areas where capital improvement works may be worthwhile.
- 3.40 **Essex Shoreline Management Plan, 1997** This provides a large-scale assessment of the risks associated with coastal evolution and presents a policy framework to address these risks to people and the developed, historic and natural environment in a sustainable manner. In doing so, the Shoreline Management Plan (SMP) is a high-level document that forms an important part of the strategy for flood and coastal defence. The process of preparing and updated the SMP is currently underway.
- 3.41 The Thames Estuary 2100 group have prepared the **TE2100 Plan (Consultation Document, April 2009)**. This plan seeks to find ways of managing flood risk on the Thames Estuary, extending into central London and out to Southend. The plan states that the Southend area extending round the end of the estuary and including Leigh on

Sea as a very different character to the rest of the estuary. Therefore, this area is treated separately (Action Zone 8). It states 'Southend-on-Sea is a seaside resort and Leigh has a strong fishing tradition. The policy unit has a long frontage and a narrow floodplain.' The flood risk management policy assigned to the area is: 'To keep up with climate change and keep flood risk at current levels, we and others will need to do more to manage and reduce both the likelihood and consequence of flooding'.

- 3.42 Because of the fishing tradition and close links to the estuary at Leigh-on-Sea the defences are a low height are low and properties are built with raised thresholds and other resilience measures to protect against tidal flooding. More modern development may be at risk as it has not been built to take account of this need for resilience. The TE2100 would like to maintain low defences in this area in keeping with the traditional character. Resilience in all building will be essential.
- 3.43 Existing flood management includes:
  - tidal flood defences
  - beaches with groynes and beach recharge
  - drainage system outfalls
  - resilient buildings and rapid drainage measures.
- 3.44 Plans for future new raised and defences on the Southend-on-Sea frontage should be designed so that:
  - they do not encroach on the estuary
  - the raised part of the defences could consist of a new defence on a new alignment behind the sea front where space permits (for example park areas) so that the heights of the walls on the sea front are limited
  - walkways are raised to provide sea views and access points are improved
  - demountable defences and gated access points may be included in the design in some areas providing that satisfactory arrangements can be made for security of closure.

# 4 Baseline characterisation of the Borough

- 4.1 During preparation of the SA of the Core Strategy information was collected on sustainability issues on a Borough-wide basis. The DPD also covers the whole plan area; therefore baseline information gathered for the Core Strategy SA is applicable for this SA. This section of the scoping report updates the information from the previous SA.
- 4.2 The SEA Directive is concerned with the assessment of 'the likely significant effects on the environment of implementing the plan', and this requires where possible some understanding of the 'baseline' situation so that the change that might arise from the influence of the plan can be considered.
- 4.3 The SA Report of the Core Strategy submission draft contains as Appendix 2 baseline information for the Borough.

#### **Summary of issues**

- 4.4 Overall the gathering of data on the environmental baseline has served to identify a few key issues in the Plan area:
  - parts of the Borough are under quite high risk of flood, although direct tidal inundation is largely mitigated for through sea flood defences.
     However, tidal effects on the rivers in the Borough may present a greater risk to the central area, and effects of climate change will only serve to increase this
  - habitats of international significance are located within the Borough, although outside the built development boundary. These must be protected not only from direct disturbance from development but also change that would threaten their integrity, such as increased pollution or changes in water availability. However the key threat which is largely beyond the control of the LDF is caused by built development limiting the natural movement of the coastal mudflats inland. These effects of 'coastal squeeze' will be exacerbated by climate change and sea level rise
  - the constrained boundaries of the Borough and the need for new housing
    is putting pressure on open space within the built up area for
    development, as well as on the high quality agricultural land on the built
    up area boundary, maximising the need to make best use of urban land
    including in the town centre
  - nature conservation and biodiversity assets within the built up area are limited, and every attempt should be made to conserve and enhance existing assets, and create new ones, as well as the protection and enhancement of wildlife corridors
  - there are increasing traffic levels in the Borough, with consequences for air quality, and new development must help to limit any increase in this, by endeavouring to suggest a change to travel patterns (number, length and mode), through the spatial strategy

- studies have identified limits to the availability and accessibility of open space of different types and standard, especially in central Southend-on-Sea
- the East of England, and south Essex in particular is, and will be, experiencing a shortage of potable water supply, therefore this must be taken into account in new development, and every attempt made to include water efficient design into new development
- the quality of the built environment is important, not only with the effect of new building in 'mending the fabric', but also in affecting existing areas of identifiable character. Parts of central Southend are characterised by a current low quality in the built environment, although the underlying quality of the natural and built environment is high in many areas.
- 4.5 The key social and economic impacts are the:
  - current high levels of out commuting to London, due to relatively low house prices in Southend-on-Sea compared to the other local authority areas around London, and lack of appropriate employment opportunities in the Borough
  - an identified need for affordable housing, suitably sized family houses as well as homes to meet the needs of single person households
  - if there is no diversification of the economy this could lead to economic downturn in the area as the traditional employment base of the Borough is in decline, there is a need to support growing specialist sectors
  - relatively high levels of deprivation in some parts of the Borough, according to the Indices of Deprivation 2007, which identifies that some wards contain areas of significant deprivation, especially in the central area. For example, most of the Kursaal ward and parts of the Milton and Southchurch wards are in the 10% most deprived nationally. This includes areas with high levels of income, health and disability related deprivation.
- 4.6 An additional matter not addressed in the Core Strategy SA, but of importance to the DPD, is the impacts of climate change. Most recent predictions of the climate change for the East of England come from the UK Climate Projections (UKCP09). The predictions are all shown for the 2050s under a medium emissions scenario; predictions under low or higher scenarios emissions will be correspondingly lower and higher:
  - increased summer mean temperatures, with higher peak temperatures as well as prolonged periods of high temperature
  - in summer there is likely to be at least a 17% reduction in rainfall (could be as much as a 38% reduction), but an increase of 14% winter precipitation levels (or as much as 31% increase)
- 4.7 Predictions of sea level rise in the London area are included in the UK Climate Projections *Marine and Coastal Projections Report* (June, 2009). These show

that by 2050 sea level rise could be up to 25.8cm (high emissions scenarios) but even under low scenarios could be 18.4cm.

- 4.8 Sea level rise could lead to issues such as:
  - water resource deficiencies, which may lead to serious issues in the area particularly with the levels of development set for the Thames Gateway
  - increased flood risk, including for sea defence overtopping, and also from rivers
  - a risk of subsidence through changing soil moisture levels.

#### Additional information

- 4.9 Since the preparation of the Core Strategy sustainability appraisal, additional information on the baseline was gathered as part of preparing the Southend Central Area Action Plan (AAP). Also, work was begun on a sustainability appraisal of a Seafront AAP. However, it was decided not to pursue the preparation of this AAP, with work therefore ceasing on the sustainability appraisal.
- 4.10 The information gathered for these two AAPs does provide a useful additional layer of up-to-date information for this sustainability appraisal. Both the Central Area (Town Centre) and Seafront are identified in DPD policies, with the Seafront specifically providing covered in detail through two of the suggested preferred policies. Appendix 2 contains the full background information collected for these two sustainability appraisals.
- 4.11 The additional scoping material gathered for the Seafront AAP identifies several matters that may need to be addressed by the SA. These are:
  - much of the Seafront is at risk of flood according to Environment Agency maps, however flood defences should protect against this. Therefore maintenance of these is essential, in addition to ensuring all new development where necessary has appropriate flood risk assessment before proceeding
  - to protect public safety and existing built assets unstable cliffs needs to be engineered as appropriate to make stable
  - air and bathing water quality of the Seafront should be maintained, or enhanced as necessary, through control of relevant development
  - biodiversity and nature conservation is a key matter that needs to be considered and it will need to be ensured that new development does not cause harm to European sites. New development should also help enhance the biodiversity quality of the Seafront area where appropriate
  - reducing car use is a theme of planning in the Borough, and this must include the Seafront roads, provision of alternatives is necessary, including better bus services west of the pier and completion of the Sustrans cycle route

- car parking in the Seafront area needs some reorganisation to reduce under-use of car parks at all times of year and encourage visitors to use improved public transport and cycle routes. Land made available after reorganisation can be used for other purposes, such as public spaces or other leisure uses
- the built environment quality of the Seafront should be enhanced to provide a cohesive Seafront style, this will include regeneration of redundant sites but this must take into account impacts on biodiversity and take into account community views
- the LDF must support the South Essex Greengrid strategy
- the LDF should make particular provision for improving the overnight visitor accommodation on the Seafront to encourage longer stays and higher visitor spend. This could also include new conference facilities
- continued support needs to be given to employment provision and new housing in the Seafront area in order to meet objectives of the Core Strategy.
- 4.12 The additional baseline material gathered for the Southend Central Area AAP identifies several matters that may need to be addressed by the SA. These are:
  - development should help in the continued enhancement of the built environment in the town centre, with new buildings of high quality and developed to sound urban design principles
  - new urban open space, including new green space, could be provided in the town centre, this may be particularly important given the changing climate and the likelihood of even greater demand for outdoor social space
  - the area is currently experiencing high levels of deprivation
  - the town centre is a focus of employment for the Borough, and this role needs to be maintained, while also ensuring a range of employment opportunities are maintained in a variety of employment sectors. It will also be necessary to ensure high quality jobs are provided
  - air quality of the town centre should be maintained
  - every attempt should made to bring biodiversity enhancements to the Town Centre, and also to ensure development in this area does not harm the nearby Natura 2000 sites
  - much of the Town Centre is used for car parking, the LDF and other plans should set out strategies for the rationalisation of town centre parking in order to allow land to be released for other uses and create a higher quality urban environment. In addition, establishing residents parking schemes in the neighbourhoods in proximity to commercial and office areas is necessary to reduce car commuting, in tandem with delivery of the Local Transport Plan proposals for improved public transport in and around the town centre.

# 5 Sustainability Framework

- 5.1 The framework below is based upon that in the Core Strategy Sustainability Appraisal framework. Changes have been made to bring the framework up-to-date based on the updated policy context, the baseline data and the issues and options reports are covered by the DPD.
- 5.2 Further detail on the derivation of the objectives of the sustainability framework are shown in the Core Strategy SA report, including the Scoping stage report.

Figure 5.1: Sustainability appraisal framework for the SA of Southend on Sea LDF

Concern	Explanation and desirable direction of change	Objectives	Means of identifying and reporting impact and contribution of the proposals and policies in the LDF
Social progress which	recognises the needs of everyone		
Accessibility	enable all to have similar and sufficient levels of access to services, facilities and opportunities	<ul> <li>maintain Southend town centre services, as the most accessible location</li> <li>improve accessibility to the town centre</li> <li>improvement in public transport accessibility along the entire length of the seafront</li> </ul>	doc – likelihood of increase in facilities and mix of uses
Housing	to provide the opportunity for people to meet their housing need	<ul> <li>ensure a sufficient number of dwellings</li> <li>encourage a suitable mix of dwellings, including tenure and size</li> </ul>	<ul> <li>quan – no of dwellings created</li> <li>quan – no of affordable dwellings (by different types) likely to arise</li> </ul>
Education & Skills	to assist people in gaining the skills to fulfil their potential and increase their contribution to the community	<ul> <li>improve accessibility to employment and education facilities</li> <li>support continued development of the University campus in the town centre</li> </ul>	doc – but little reliability of prediction
Health, safety and security	<ul> <li>to improve overall levels of health, reduce the disparities between different groups and different areas, and reduce crime and the fear of crime</li> </ul>	<ul> <li>improvements to reduce fear of crime in the town centre, especially at night</li> <li>improve pedestrian routes through the town centre and seafront to help design out crime</li> </ul>	<ul> <li>quan – area and population subject to increased or decreased risk of flooding</li> <li>doc – likelihood of increased or decreased health standards (but little reliability of prediction)</li> </ul>
Community	to value and nurture a sense of belonging in a cohesive community, whilst respecting diversity	<ul> <li>improve the viability and distinctive character of Southend-on-Sea town centre</li> <li>provide public art and improvements to the design of seafront tourist buildings, such as beach huts and kiosks to provide a recognisable unified approach for Southend</li> <li>provide new community open spaces in the town centre and seafront</li> </ul>	doc – but little reliability of prediction

Effective protection of the environment					
Biodiversity	to maintain and enhance the diversity and abundance of species, and safeguard these areas of significant nature conservation value	<ul> <li>protect undeveloped parts of the coastline</li> <li>protect key habitats directly or indirectly from developments which may harm them</li> <li>ensure new development brings enhancements to the built environment where appropriate</li> <li>ensure 'appropriate assessment' of all development is carried out where appropriate</li> </ul>	<ul> <li>quan – area of significant habitat affected</li> <li>quan – potential area of significant habitat created / better managed</li> <li>doc – likelihood of increase in biodiversity from creation of opportunities</li> </ul>		
Landscape character	to maintain and enhance the quality and character and cultural significance of the landscape, including the setting and character of the settlement	<ul> <li>protect undeveloped parts of the coastline</li> <li>retain notable features and areas of open space along the coast line</li> <li>protect views of the estuary</li> </ul>	<ul> <li>quan – area of open land affected</li> <li>quan – area of designated landscape affected</li> <li>doc – likelihood of harmful change to character of landscape creating setting of the urban area</li> </ul>		
Built environment	to maintain and enhance the quality, safety and distinctiveness of the built environment and the cultural heritage	<ul> <li>enhance and protect land mark and listed buildings on the sea front</li> <li>enhance and protect listed buildings and those of interest in the town centre</li> <li>improve urban design quality through policy</li> <li>protect existing and create new open and green space</li> </ul>	<ul> <li>quan – area of useable and amenity open space affected</li> <li>quan – potential area of useable and amenity open space created</li> <li>quan – area of valued townscape harmed by change</li> <li>doc – likelihood of increase in urban quality through new provision and investment</li> <li>doc – likelihood of increase in urban quality through emphasis on quality</li> </ul>		

Prudent use of natural resources						
Air	to reduce all forms of air pollution in the interests of local air quality and the integrity of the atmosphere	centre encourage f	c congestion in the town reight modal shift and a reduction in emissions of gs		doc – likelihood of increase or decrease in emissions. Regional target is for stabilising car traffic levels in Southend at 1999 levels and to increase the proportion of freight carried to and from ports by rail to 30% by 2020. Regional target to increase the proportion of energy met	

Water	to maintain and improve the quantity and quality of ground, sea and river waters, and minimise the risk of flooding	<ul> <li>ensure no increased risk of coastal flooding</li> <li>acknowledge the risk to water quality from on-shore developments</li> </ul>	from renewable sources (on-shore + off-shore) to 44% by 2020.  doc – likelihood of increase or decrease in emissions  quan – number of planning applications granted contrary to Environment Agency advice on flood risk.
Land	<ul> <li>to use land efficiently, retaining undeveloped land and bringing contaminated land back into use</li> </ul>	<ul> <li>protect undeveloped coastline in the Borough</li> <li>encourage development on previously developed land</li> <li>encourage high density residential development and mixed use development in the town centre</li> </ul>	<ul> <li>quan – area of open land affected irreversibly by development.</li> <li>quan – area of damaged land likely to be brought back into use - national and regional previously developed land target is 60% and minimum dwelling densities at 30 dwellings per hectare.</li> </ul>
Soil	to maintain the resource of productive soil	protect productive soil where applicable (little overall impact likely)	quan – area of productive land affected
Minerals and other raw materials	to maintain the stock of minerals and other raw materials	minimise use of aggregates for new development (relevance to sea defences)	<ul> <li>quan – area of potential minerals extraction put beyond viable exploitation by development</li> <li>doc – efficiency of the use of primary and secondary materials</li> <li>doc – likely affect on reuse and recycling of materials - regional target to recover 70% of household waste by 2015</li> </ul>
Energy sources	to increase the opportunities for energy generation from renewable energy sources, maintain the stock of non renewable energy sources and make the best use of the materials, energy and effort embodied in the product of previous activity	reduce the growth in car use and congestion within Borough	<ul> <li>quan – contribution likely from energy generation from renewable source schemes</li> <li>quan – contribution likely from energy generation within new buildings</li> <li>doc – likelihood of increase in efficiency of energy use in new development</li> </ul>
Maintenance of high an	d stable levels of economic growth and employme	nt	
Local economy	to achieve a clear connection between effort and benefit, by making the most of local strengths, seeking community regeneration, and fostering economic activity	<ul> <li>improve the viability and vitality of the town centre as economic hub for the Borough</li> <li>improve the viability and vitality of the seafront as a major and flexible tourist destination</li> </ul>	doc – likelihood of increase in desirable economic characteristics

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Employment	to maintain and enhance employment	<ul> <li>identify sites for local business start ups in accessible locations</li> <li>work to create new jobs in a range of</li> </ul>	quan – potential number of new jobs in
Linployment	opportunities matched to the size of the local labour force and its various skills, and to reduce the disparities arising from unequal access to jobs	<ul> <li>work to create flew jobs in a range of sectors within the Borough</li> <li>work to make the coast a major destination for conferences (as in Community Strategy)</li> <li>support a diverse range of businesses premises to meet different needs, as well as supporting existing business clusters</li> </ul>	different sectors and match to predicted needs of workforce
Wealth creation	<ul> <li>to retain and enhance the factors which are conducive to wealth creation, including personal creativity, infrastructure, accessibility and the local strengths and qualities that are attractive to visitors and investors</li> </ul>	<ul> <li>contribute to creating attractive environment for business to flourish improve access for all residents to a range of jobs</li> </ul>	doc – likelihood of increase in desirable economic characteristics

Notes: **doc** – matter where prediction of outcome likely to be presented in terms of 'likely direction of change' **quan** – matter where prediction of outcome likely to be presented in quantified terms

#### Sustainability appraisal of development management 6 policies

6.1 The sustainability appraisal of the proposed policies is shown in the appraisal matrices of this section. The matrices aim to assess how each policy will contribute to sustainable development and include recommendations on possible amendments to improve this, where necessary.

#### The policy hierarchy

- 6.2 The development management policies will not act alone in delivering sustainable development in Southend-on-Sea. Higher tiers of policy are set at a national level through Planning Policy Statements and Planning Policy Guidance<sup>4</sup>. At a regional level for the East of the England currently policy is set in the Regional Spatial Strategy (RSS)5.
- At a local level the Core Strategy<sup>6</sup> sets the strategic policies and overarching policy for 6.3 development principles and implementation. These policies set:
  - the general spatial strategy and the location of new development, such as the Seafront, Shoeburyness and the Priority Urban Areas (Policy KP1), and the level of development directed to each area (CP1: employment, CP8: dwelling provision)
  - the fundamental principles on which development management decisions will be made (Policy KP2), and how policies will be implemented and enforced (Policy KP3)
  - more detailed policies on how development in some areas will be delivered (CP2: town centre and retail), this includes elements of sustainable development (CP3: transport and access, CP4: the environment and urban renaissance).
- 6.4 Regional and Core Strategies have been subject of sustainability appraisal at the appropriate level.
- 6.5 Other Local Development Framework policy will contain more detail and site specific matters. For instance, the Central AAP will include site specific allocations and implementation policies.
- 6.6 It is the role of these development management policies to provide the local detail to national, regional and Core Strategy policies. This detail should be tailored to control implementation of all proposed development in Southend-on-Sea, including that set out in the spatial strategy and site allocations DPDs. The aim is to make sure all new development makes a contribution to more sustainable development in the Borough, avoid adverse impacts and maximise sustainability benefits. To achieve this, the development management policies need to be comprehensive but at the same time readily understandable by being clear and concise.

Since the 2010 change of government, all national policy is under review.

<sup>&</sup>lt;sup>5</sup> The 'Decentralisation and Localism Bill' (May, 2010) announced by the coalition government proposes to abolish Regional Spatial Strategies.

Southend-on-Sea LDF DPD1: Core Strategy (December, 2007)

#### Sustainability appraisal recommendations from Core Strategy

- 6.7 The findings of the sustainability appraisal of the Core Strategy policies were generally supportive. The SA assessed that the Core Strategy, subject to some controls over implementation and design of development, could contribute to greater sustainability.
- 6.8 Identified ways of mitigating against the possible adverse sustainability impacts of the policy are included in section 6 and Appendix 1 matrices of the Core Strategy SA Report<sup>7</sup> are to put in place detailed policy criteria to help guide development and through the allocation of sites. The Development Management Policies have a large part to play in establishing these policy criteria, with AAPs guiding the location of development through allocations.
- 6.9 Ways that policies can help mitigate impacts are identified as:
  - Design policies to help maintain and enhance the built environment quality of the Borough
  - Policies to help encourage walking and cycling by encourage new development to prioritise walkers and cyclists
  - Policies to set targets for sustainable construction and energy use
  - Policies to help focus retail development on the town centre
  - Recognition of the high biodiversity quality of parts of the Borough, and the need to protect and enhance biodiversity wherever it is found.
- 6.10 The Development Management DPD does cover these issues well, although more emphasis could be given to the protection of designated nature conservation sites.

# The role of Development Management policies in delivering sustainable development

- 6.11 Development management policies have a role in tailoring national and regional policies to respond to specific circumstances in the local area. These circumstances may include protecting and enhancing features of local importance, or controlling development to help address known environmental/social/economic problems in the area.
- 6.12 There are several fundamental issues that development management policies will cover relating to achieving more sustainable development. These include:
  - the need for new buildings to be designed to enhance the built environment and protect built heritage
  - · to reduce resource use
  - the need to protect the natural environment, and in particularly avoid impact to the internationally designated nature conservation sites on the Southend-on-Sea foreshore

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<sup>&</sup>lt;sup>7</sup> Sustainability Appraisal for the Southend-on-Sea Local Development Framework: Core Strategy Development Plan Document (Submission Version), August 2006

- to lower people's dependence on car travel through the design of new development, links to public transport, walking and cycling routes, limiting car parking, providing a mix of land uses
- protecting people from potential safety risks, such as contamination or flood
- make sure the types of development provided is suitable to meet people's needs, such as the type and tenure of housing and the location of visitor accommodation
- The appraisal of the Southend-on-Sea development management polices reveal that the majority of the policies are compatible with sustainable development. The appraisal shows that for issues such as improving access and reducing car dependence the policies perform well. In addition, policies are also strong on protecting the economy and amenity in residential areas. Some issues, such as protection of landscape or biodiversity are less thoroughly covered in this planning tier, but are covered in Core Strategy (Policy CP7 'Green Space and Green Grid Strategy') and higher tiers. Plan makers will need to be satisfied there are no gaps. However, it will be important to ensure the topics are covered in sufficient detail so as to respond to local needs and concerns.

#### Alternative approach to setting policy

- 6.14 For most of the proposed policies, one or more options is presented for policy wording or implementation. These options are appraised as part of the sustainability matrices. In the majority of cases the suggested preferred option is most compatible with sustainable development. However, in some instances the sustainability appraisal comments that the options presented are not really viable alternatives, examples include:
  - where policy is set nationally therefore alternatives can not be considered
  - options are not really either/or choices
  - options are not reasonable with one option clearly noticeably preferable and not pursing it would have no benefit. Where no options exist it is reasonable not to include any.
- 6.15 As part of making a comprehensive, but at the same time readily understandable, set of policies there may be an alternative way of creating as set of development management policies. In taking forward the policy areas identified as being important to tackling local issues this alternative approach may be effective in helping make a more usable plan for officers, applicants and consultees.
- The approach taken to setting policy in the Issues and Options DPD covers many specific types of development, such as houses in multiple occupation, tall buildings or extensions, and develops policies to respond to this. This method is useful as it allows developers to find policies that directly relate to their needs. However, it does create some repetition between policies, for example access and design. This repetition results in a longer plan, and possibly one that is more difficult to use and therefore to secure sustainable development. Also, a longer plan may risk some of the principle messages about delivering sustainable development becoming lost.

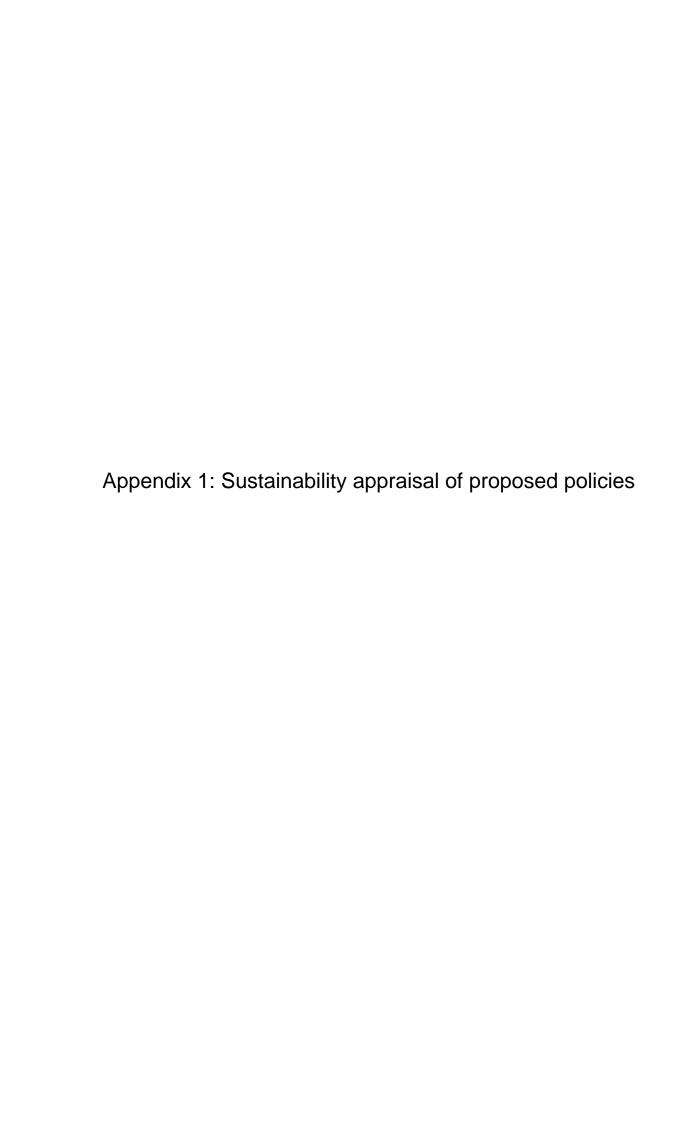
- 6.17 An alternative approach to development management policies, which has been used in other parts of the country, is to identify a limited number of topic based policies that act as a catch-all for all development.
- 6.18 Pursuing this 'catch-all' alternative method of developing policies would not result in any major changes to the overall sustainability coverage of the Southend-on-Sea development management DPD. It is only an alternative way of presenting many of the development criteria that have been developed as part of the Issues and Options version DPD.
- 6.19 Topic based policies might include:
  - high quality design this could include matters such as tall buildings, extensions and alterations, either explicitly or implicitly through criteria
  - residential amenity to protect people from harmful impacts of nearby development, such as overlooking, noise, traffic
  - protection from hazard including landslip and contamination
  - sustainable construction similar to the current policy
  - biodiversity possibly needed to reinforce the importance of this issue in Southend-on-Sea and reflect findings of a Habitats Regulations Assessment
  - built heritage including local and nationally designated features
  - transport, access and parking to provide a joined-up policy on these issues to make sure there is sustainable parking management and new development is linked to public transport walking and cycling
  - retail including access to local service centres and provision of community facilities
  - housing tenure addressing the affordable housing tenure split
  - housing mix to cover issues such as the mix of size of homes and minimum space standards (possibly combined with the housing tenure policy)
  - protection of employment land including employment clusters and local employment sites
  - Seafront including flooding and the objectives for the zones.

#### **Comments and recommendations**

- 6.20 The policies show a good coverage of the sustainability issues, as noted at paragraph 6.7. However, there are few recommendations on how policies could be improved to make sure they deliver anticipated sustainability benefits. These include:
  - Careful use of wording to positively aim for the best from development, for instance avoiding using the word 'satisfactory'
  - Preparation of design briefs or masterplans to help guide development, such as in Seafront zones or in the renewal of employment sites
  - Avoiding duplication within and between policies
  - Highlighting the importance of protecting biodiversity assets, especially related to sites protected under the Habitats Directive

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- Where the policy seeks targets and thresholds that differ from national or regional policy the Council may need to provide evidence to justify these are suitable and viable, this will help make sure policies are tailored to meet local needs
- 6.21 To encourage the development of large scale grid or district renewable energy schemes the Development Management policies could contain criteria for delivering this type of scheme. Southend-on-Sea may have the potential for tidal or wind energy generation due to the coastal position. In addition, district heat and power schemes are likely to have a greater role in future in supplying lower carbon energy to homes, businesses and public buildings.



#### **KEY TO MATRICES**

#### Policy name and number

#### Relationship of policy with sustainable development

Comment on how the principles of the proposed policy topic could contribute to sustainable development. However, this does not reflect the detailed policy wording.

#### Sustainability appraisal comment

Comment on the specific policy criteria and wording and how this may help deliver or detract from achieving sustainable development. This comment includes suggestions for improvements to the policy where impacts are identified.

#### **Options**

A brief appraisal of the relative sustainability impacts of the alternatives as they are presented in for the policy.

#### Sustainability objectives

Where the policy may have an impact on one of the sustainability objectives developed for the SA of the Southend-on-Sea LDF this is noted here. Possible relationships are:

- + Positive relationship implementing the policy will help meet the sustainability objective.
- Negative relationship implementing the policy as it currently stands has the potential to have a negative impact on meeting this sustainability objective
- ? The exact relationship of the impact is difficult to predict and may depend on interpretation of the policy or other factors being in place.

For some relationships uncertainty may mean more than one symbol is applied.

#### Recommendations

This is a list of possible ways to mitigate impacts through changing the policy or through other plans and strategies.

#### Issue DM1 - Design of new development

#### Relationship of policy with sustainable development

Designing development has a role in delivering sustainable development through making a place attractive to those who live and work there. A high quality built environment also helps to attract visitors and investors to an area. It can also help people identify and feel proud of the place they live, which is part of creating community identity.

Good urban design and the ground floor appearance of buildings can make places more pleasant for walking and cycling. As part of a cohesive strategy this can help reduce car dependence.

#### Sustainability appraisal comment

The suggested preferred option provides a policy to help implement the 'Design and Townscape Guide' SPD as well as providing additional detail to Core Strategy policies CP4 and KP2.

The policy should help deliver better design in development, although it is quite wordy and a simple and clearer policy may be more usable in setting out the principles of good design and the matters that will by key in making decisions on the suitability of development.

Seeking higher density development in the more accessible parts of the Borough will help in the efficient use of land, as well as supporting a critical mass of population to support local shops and services.

#### **Options**

Setting less stringent requirements for design is not suitable in seeking sustainable development

Setting minimum density standards in specific locations may help to deliver development that makes the best use of land. Minimum standards will provide a good basis for refusing inappropriate development. There is no national requirement for density standards, but the Council may with to consider if this is suitable and justifiable in parts of the Borough.

#### Sustainability objectives

**Accessibility: (+)** Density and design principles promote walking and cycling. Higher density development in accessible areas will also help increase the number of people that have good access to services.

**Community: (+)** Good quality design can help foster community cohesion by creating a sense of place and community pride.

Built environment: (+) There is a clear positive relationship of this issue with this objective.

Land: (+) Higher density development will help make the best use of land.

**Wealth creation: (+)** Making sure that all new development makes a positive contribution to the character of the Borough and will help improve the town's image to investors and visitors.

#### Recommendations

For a policy to be easy to use and implement it should be as succinct as possible. A succinct policy helps to highlight the essential elements necessary to deliver higher quality design of development. The 'Design and Townscape Design Guide' SPD can be used for detailed matters.

The policy should be clear in its wording to makes sure the desired outcomes are achieved. For example, avoiding ambiguous wording, such as 'satisfactory' when referring to the relationship of new development and its surroundings.

#### Issue DM2 - Tall buildings

#### Relationship of policy with sustainable development

Tall buildings have the potential to create landmark features that can become part of the image of an area. These buildings can help make good use of land as they are very high density and can incorporate a mix of uses on a single footprint. However, if these buildings are not of a very high quality they can be an eyesore detracting from the quality of the area and character of an area.

#### Sustainability appraisal comment

This policy alongside those on the design of development should help make sure that tall buildings do not adversely impact on the Borough. In Southend-on-Sea tall buildings have the potential to bring a focus to parts of the town that may need an improved sense of place. However, there is the potential for unsuitable or poorly designed buildings to create an adverse impact that could have a detrimental legacy for the area. It is therefore essential that these buildings are of a high quality design, both in their appearance from far away as well as their interaction at ground level with streets and people.

Using the AAPs to identify suitable sites will help make sure these buildings are in sustainable locations. It is essential that this type of building is only permitted in areas of good public transport access by train and bus, with all necessary services (which will depend on building use) are located within walking distance.

#### **Options**

The SA supports strong control of the location of tall buildings to ensure they are accessible by more sustainable travel types and in locations where they could complement the existing built environment.

#### Sustainability objectives

**Accessibility: (+)** If the sites chosen are at transport hubs and near shops and services this policy should help promote accessibility.

**Built environment: (+/-)** There is the possibility that this policy could be detrimental to the quality of the built environment depending on the urban design and architectural quality. An architecturally unique building has the potential to create a new urban landmark for Southendon-Sea.

**Land: (+)** Tall buildings make efficient use of land.

**Wealth creation: (+)** Tall buildings in Southend-on-Sea could help improve the image of the area, attracting in ward investment.

#### Recommendations

Tall buildings in particular should involve early and extensive discussion with planning officers and involvement of third parties, such as CABE design review panels. The high visual impact of these buildings has the potential to have major positive or major negative impacts on the town.

For this type of large project a dedicated working group within the council may be necessary to secure good design. This group should be influential from inception to completion of any construction.

More emphasis should be given to the street level impact of these buildings, ensuring all sides present attractive places for people to be.

A definition of a 'tall building' should be given in the explanatory text or policy, when the Council has commissioned a Borough wide Character Assessment.

The policy should state that these buildings would only be permitted at transport hubs and areas of already high footfall, identification of suitable sites will be through the AAPs.

#### Issue DM3 – Intensification of existing residential sites and areas

#### Relationship of policy with sustainable development

Backland development and sub-division of homes has the potential to make good use of land and help meet housing needs. However, intensification can be detrimental to the character of areas and sub-division can result in cramped living spaces.

#### Sustainability appraisal comment

This policy should help in reducing the adverse impacts of intensification of development. This will include making new development fit with the existing character of the area and also recognise the biodiversity potential of some backland sites. The policy approach is compatible with sustainable development relating to the protection of residential and environmental amenity.

There is the risk that this policy could be applied too strictly with adverse impacts on the delivery of homes to meet the housing needs of the Borough. For instance, requiring that all conversions of houses to flats meet 'lifetime home standards' may severely restrict the potential for this type of development. There is an identified need for small homes in Southend-on-Sea due to the high number of single person households. Sub-division of larger family homes can help supply the demand for flats, and where these divisions are of a high quality can make attractive places to live in urban areas.

However, there is also a shortfall of 3-bedroom and 4-bedroom properties in Southend-on-Sea as a result of sub-division. Therefore, a balance needs to be found between meeting demand for smaller properties and maintaining the supply of larger family homes.

The more efficient use of land and provision of homes are important aspects of delivering sustainable development in the Borough, especially as available space is limited. This type of development can help reduce the need for development on greenfield sites.

#### **Options**

The options presented are not strictly viable – with national and other policy sufficient to control the delivery of this type of development.

#### Sustainability objectives

**Housing (-)** There is a potentially negative impact of this policy on achieving housing targets to meet needs in Southend-on-Sea.

**Community (+):** Restricting over intensification of residential areas may help avoid community tensions that this may create.

**Biodiversity (+):** This policy could help to protect against the adverse impacts on biodiversity from infill development.

Built environment (+): This policy may help to protect built-up areas from over-intensification.

**Land (-)**: There is a potentially negative relationship between this policy and the efficient use of land. If the policy is over-restrictive on development in urban areas new greenfield sites may be needed to meet the housing need in the Borough.

#### Recommendations

This policy may be surplus to needs, removing it is unlikely to have an adverse impact on controlling the impacts of this type of development. Other policies, such as design, protection of biodiversity and space standards cover similar issues.

The criteria for all new homes to be of 'lifetime home standards' is likely to be overly restrictive and impact on the delivery.

#### Issue DM4 – Low carbon and efficient use of resources

#### Relationship of policy with sustainable development

To achieve sustainable development, it is essential to reduce the amount of resources consumed by new development. Resource use needs to be reduced in the construction and during occupation of new development. This includes reduced dependency on fossil fuel, more efficient water use, and reducing in material waste and use of new materials.

#### Sustainability appraisal comment

The aim of this policy is supported in the sustainability appraisal. The policy usefully sets out the range of criteria needed to ensure new development is built to reduce resource dependency and lower the overall increase in resource use that would result from new development. The policy also includes details on the potential for greening of development sites and to ensure these are appropriately phased into construction timetables.

Best practice and policy on CO<sub>2</sub> reduction and energy efficiency is constantly changing. Therefore, the policy needs to ensure the wording and terminology is in keeping with this, to make sure the policy criteria can be effectively implemented and enforced.

Where the policy proposes going above national targets for carbon reduction this needs to be supported by evidence, such as viability studies. This evidence is likely to be necessary in helping to get the policy adopted and later in negotiations on planning applications and enforcement. In addition, evidence can help demonstrate to developers that targets that appear onerous are achievable without harming profit margins, and therefore not stalling delivery of new homes to meet needs.

In preference to seeking targets for 'on-site renewables' it may be preferable to seek targets for decentralised energy generation, which encompasses renewables but also other more carbon efficient energy generation. Similarly setting targets for carbon reduction and efficiencies may be preferable and easier to implemented that energy reductions based on how building regulations are calculated.

Thinking about the long-term potential, development management policies should address issues associated with community heat and power schemes. For instance, new buildings should be designed to be able to connect to community power scheme if one were to become available.

#### **Options**

Relying only on national policy and building regulations to secure lower carbon development may deliver lower reductions than set out through this policy. However, to secure and justify the higher targets proposed in this policy additional evidence on viability may need to be prepared.

The second proposed option is to 'insist on a greater reduction of carbon from new development'. It does appear that requiring a Code for Sustainable Homes level 4 is above what is set by national policy and therefore likely to achieve more environmentally sustainable development than would otherwise be required.

#### Sustainability objectives

**Biodiversity (+):** The policy includes greening of development sites with potential positive impacts in relation to this objective.

**Built environment (?):** The layout of new development to make it more energy efficient may have implications for the built environment.

**Air (+):** Reduction in use of fossil fuels for energy generation will help improve air quality from power generation, with local, national and international implications.

**Minerals and other raw materials (+):** Meeting Code for Sustainable Homes standards and complying with proposed criteria should help reduce use of primary materials for construction.

**Energy (+)** This policy relates well to this objective.

#### Recommendations

Plan makers should gather additional evidence on viability of achieving higher sustainable construction targets than set by national and regional policy.

Targets should be expressed in terms of 'carbon' not 'energy'.

Criteria should refer to decentralised energy generation, so that this encompasses more carbon efficient fossil fuel options as well as from renewable sources.

Criteria could be considered on connections to heat networks, in order to future-proof new buildings.

The policy should focus on sustainable construction related to resources, and reference to flooding should be removed to avoid overlapping policies.

A policy or criteria on proposed community based decentralised energy or heat networks could be included in the DPD. This could be in conjunction with proposals or identified sites in AAPs.

#### Issue DM5 – Southend-on-Sea's historic environment

#### Relationship of policy with sustainable development

The historic heritage of an area can provide a sense of place and links with the past. In Southend-on-Sea buildings and structures are an important part of the heritage of the town as a holiday resort. Preserving heritage has positive sustainability benefits for helping protect community identity through pride in the unique characteristics of the town. Also, preserving built heritage is important as an economic asset to the town.

#### Sustainability appraisal comment

The policy criteria should help in the protection of nationally and locally important historic and archaeological heritage in Southend-on-Sea. Recognising the importance of locally listed buildings can help in protecting features that may hold particular significance to local people and their identity with the town despite perhaps being of little national significance. When identifying locally important buildings it should be inclusive of potential heritage buildings of the future. Nationally, much architecturally unique 20<sup>th</sup> century architecture is undervalued in planning decisions.

#### **Options**

The option presented is not necessarily viable as historic heritage features of national importance are protected through regional and national policy. The policy could be more specific to the particular controls on locally important heritage features and other matters that are not addressed in national or regional policy.

#### Sustainability objectives

**Community (+):** Built and archaeological heritage can be important to community identity through creating a sense of place. The policy should have positive implications against this objective.

**Built environment (+):** This policy positively relates to protecting the built environment.

**Wealth Creation/Local Economy (+):** The character of Southend-on-Sea as an historic seaside resort is essential to the economy of the town. Protecting and enhancing built heritage will have positive benefits against these objectives.

#### Recommendations

The policy may need to differentiate between the level of protection given to locally important features compared to those of national importance.

The policy could place greater emphasis on enhancing conservation areas. Criteria could be included to favour the redevelopment of sites in conservation areas that currently detract from their character.

The policy could be made more succinct to avoid unnecessary repetition of Core Strategy, regional and national policy.

# Issue DM6 – Alterations and additions to existing buildings

# Relationship of policy with sustainable development

Changes to existing buildings can have an impact on built environment quality.

# Sustainability appraisal comment

This policy is positive in terms of ensuring that new alternations and extensions to properties are in keeping with their current character.

The policy criteria could include a clause that would look favourably on this type of development if it also served to enhance the character of existing buildings.

# **Options**

If criteria were included in the design policy on alterations and extensions this policy may be unnecessary.

## Sustainability objectives

Built environment: (+) There is a clear positive relationship of this issue with this objective.

Land: (+) Higher density development will help make the best use of land.

**Wealth creation: (+)** Making sure that all new development makes a positive contribution to the character of the Borough will help improve the town's image to investors and for visitors.

### Recommendations

To reduce length and repetition in the DPD this policy could be omitted. Policies on design quality should be sufficient to control this type of development where planning permission is required.

## Issue DM7 – Flood risk and water management

### Relationship of policy with sustainable development

The limited land availability for new development and focus of the seafront means much new development may be at risk of flooding. Policies need to be in place to control this risk to ensure risks to safety are minimised.

# Sustainability appraisal comment

The policy permits development in flood risk zones on the seafront. In Southend-on-Sea this is important as the seafront is a major development zone for the Borough and preventing development where it could harm the potential of the area to provides homes and help sustain the economy. However, allowing development in these locations does increase the risk of flood for this new development. The policy proposes measures to deal with this risk, including maintenance of existing sea defences and designing new development to be resilient and resistant to flood.

Maintaining sea defences where they exist should help in the preservation of the existing built environment from the risk of flood, meeting sustainability objectives relating to the economy and protection of health.

However, where these defences include beach replenishment it will be important to consider the wider sustainability implications of this, including the source of the replenishment material and the suitability of this type of coastal protection. The AAP may need to give consideration to more innovate coastal management schemes where hard sea defences are no longer the best option for coastal management. For instance to alleviate issues of coastal squeeze, where sea level rise and hard sea defences are causing the area of foreshore to narrow, resulting in a loss of areas of high environmental quality, it may be suitable to consider new options.

The policy requires that new development in flood risk zones is 'resistant **or** resilient' to flood. To minimise risks development should be 'resistant **and** resilient'. Resistant development will be where flood defences are maintained. Resilient development is important to reduce the scale of risk and harm for the instances where flooding does occur – such as sea defences being overtopped in a sea surge or storm. Resilience will need to be designed into development, such as buildings being raised off ground levels, internal drains, or be built of materials that can withstand prolonged submersion. It will also need to be part of general infrastructure such as drainage systems to allow water to drain away quickly following a flood.

### **Options**

The option of relying on the PPS25 sequential test would not reflect the particular characteristics of Southend-on-Sea hampering development opportunities. However, this option may be preferable in maximising safety in new development.

### Sustainability objectives

**Health, safety and security: (+)** Ensuring new development is protected from the high risk of flood will help protected safety of new users of development. However, this policy may retain a residual risk where development is in flood zone 2.

**Biodiversity (?):** Coastal defences may put the designated nature conservation sites at risk in the long-term due to coastal squeeze reducing the area of habitat available.

**Water (+):** This policy seeks to reduce the risk of flooding with positive implications against this objective.

**Land (+):** Permitting development in higher flood risk zones will make the best use of available land.

Local economy / wealth creation (+): The seafront is a major economic asset to the town,

allowing development in this area is essential in maintaining this asset.

# Recommendations

Development should be built to be resistant **and** resilient to flooding.

The impact of sea defences on biodiversity could be recognised in the policy.

Appendix 1

## Issue DM8 – Seafront public realm and open space

# Relationship of policy with sustainable development

The seafront is essential to the identity and character of Southend-on-Sea, it is a major asset to the Borough. Making sure that this area is enhanced and utilised to its full potential is important in supporting the local economy and local identity. Foreshore parts of the Borough are covered by international nature conservation designations, it is therefore essential that no development in this location causes harm to these assets.

## Sustainability appraisal comment

This policy sets out principles for development on the seafront, not necessarily decision making criteria. The policy is compatible with achieving sustainable development. The policy includes important components of sustainability:

- Protection of biodiversity
- Improvements to walking and cycling routes
- Improving open spaces
- Improving street furniture.

As referred to in the policy it will be important to have a design brief(s) for the Seafront in place to specify the exact locations and measures that are needed to bring enhancements to each area. Design briefs will also help to provide a cohesive strategy for the whole seafront, making sure all new development can deliver its part of a unified strategy. A strategy could include identifying a coherent theme for street furniture and cycle/pedestrian routes along the whole length of the seafront.

# **Options**

Having a specific Seafront policy helps identify specific issue of importance to maintaining and enhancing the character of the area. Including this policy is likely to achieve better outcomes for the area than relying on the design policy alone (as it is currently written).

# Sustainability objectives

**Accessibility: (+)** The policy includes principles of improving the promenade for pedestrians and cyclists

**Community: (+)** The seafront is an important part of the cultural identity of Southend-on-Sea, therefore enhancing it can contribute to a sense of place and community identity.

**Biodiversity (+):** The policy recognises the need to protect the biodiversity value of the seafront and foreshore.

**Built environment: (+)** There is a clear positive relationship of this issue with this objective.

**Wealth creation/local employment: (+)** Making sure that all new development makes a positive contribution to the character of the Borough will help improve the town's image to investors and for visitors.

### Recommendations

Complete Design Brief(s) for the Seafront at the earliest opportunity as part of a unified urban design strategy for the area.

Link this policy with the other policies relating to the Seafront.

### Issue DM9 – Seafront character zones

# Relationship of policy with sustainable development

The seven miles of Seafront has a varying role and function along its length. Setting the principles for development in specific zones helps to identify what is important in each area, this may help maximise benefits from development in each zone.

### Sustainability appraisal comment

The AAP area has been divided into separate zones. These zones help to highlight the particular characteristics and proposals in each area, tailoring the AAP to respond to specific sustainability issues in each.

Two Tree Island, Leigh Marshes and Belton Hills: This area is identified as of local importance for outdoor recreation and will be maintained and improved for this use.

Leigh Port and Old Town: The policy suggests maintaining the marine industrial use of the Port. This is important in retaining the historic integrity of the area. The loss of these to alternative economic uses, with no connection to the Thames-front location, would be to the detriment of the character of the town. A design brief for this location could include guidance for design in the conservation area to allow development to respond to the particular characteristics of the area. Also, reducing traffic through the Old Town area would have positive benefits for its heritage value and peoples' enjoyment of the area, both for visitors and local residents. This may help support businesses in the area, such as restaurants, cafes and independent shops, by encouraging more visitors by providing a high quality historic environment and tourist destination. (NB policy criteria is repetitive)

The Cinder Path (Old Leigh to Chalkwell Station including Marine and Grand Parade and Undercliff Gardens): Development here will need to preserve the quality of development and open character of the area. This also includes the need to improve the footbridge as part of the Sustrans route, helping to support healthy lifestyles and sustainable travel.

Chalkwell Esplande to Palmerston Road and Palmerston Road to San Remo Parade: The proposals in this area are to enhance the built environment by avoiding additional unsuitable building types. For sustainable development it will be important to insist on high design quality, although pastiche of existing styles should not be the only development option. Improvements to existing beach huts and resisting further huts will also help bring built environment benefits to the area.

Beach replenishment will need to be in keeping with shoreline management, ensuring that the dredging and replenishment have no unacceptable impacts on nature conservation assets.

Victoria Road to Walton Road: The policy includes the need to improve the beach structures in this location, which could have great benefits for the character of this area and encouraging visitors to this part of the Seafront. Other design proposals, such as protecting the roofline could help maintain the character of buildings in this part of the Seafront, although further design detail may be needed to prevent further erosion of built quality through inappropriate design, extensions and alterations.

Walton Road to Maplin Way: This is a low density area characterised by recreational use and beach huts on the front. The aim is to protect this area from further development. This is likely to be suitable in this location, although additional beach or seaside structures could help leisure tourism in this location.

The Core Strategy is specific about the quantity of development that is to be located in the Seafront. It is not clear from this policy how and where this development will be permitted to contribute to sustainable development in the area.

# **Options**

This policy helps to identify the issues of particular significance to the Seafront zones

identified. The zones help the plan be specific about what types of development would be suitable in each area, therefore meeting need in each area.

# Sustainability objectives

**Accessibility: (+)** The policy includes the location where the Sustrans route needs to be maintained or improved, including at the Cinder Path crossing, this should help in meeting this objective.

**Community (+)** The Seafront is an important part of the character of Southend-on-Sea and therefore enhancing the quality of the area will bring benefits to peoples' sense of place, pride in their area and therefore community identity.

**Biodiversity (?)** Proposals have the potential to have an impact on biodiversity, such as beach replenishment. The importance of protecting biodiversity assets should be reflected in policy.

**Landscape character (+)** The Seafront is an important part of the view of Southend-on-Sea from the foreshore and pier, therefore maintain building heights and ensuring better quality design will help enhance landscape/townscape views.

**Built environment (+)** Design criteria should help protect and enhance the quality of built environment in this location.

**Air (+)** Improving the Sustrans link will help support more sustainable travel choices, with the potential to improve air quality.

**Wealth creation/local employment: (+)** The Seafront is an essential asset to the character of Southend-on-Sea. Making sure that all new development makes a positive contribution to this character will help secure and improve the town's image for visitors and investors.

### Recommendations

Design Brief(s) should be prepared for the zones and the Seafront as a whole. This could include specific design guidance for each area, details of improving the Sustrans cycle route, identify notable leisure locations along the Seafront, biodiversity issues and guidance on street furniture and seafront structures. Together they should provide a unified plan for a cohesive Seafront.

The policy could contain more detail about the location of new development on the Seafront.

The policy should acknowledge the biodiversity importance of the Seafront and those locations where it needs to be protected.

It should be made clear why the central Seafront and Shoeburyness are not included in the policy.

## Issue DM10 – Water recreation

# Relationship of policy with sustainable development

Water recreation is attractive to visitors and can help the location economy. However, water based recreation and its infrastructure has the potential for adverse impacts on other visitors, natural environment and amenity. Policies to control the proliferation of this use may help control the impacts.

### Sustainability appraisal comment

The policy is quite permissive of new water recreation, subject to views being maintained and other peoples' access not being curtailed. The policy should help to make sure the impacts of this type of development are not to the detriment of other visitors or residents. However, the policy should recognise the potential impact of this use on the designated nature conservation sites and beach, it is essential to protect these sites and meet Habitats Directive expectations.

# **Options**

This policy specifically on water recreation may be more effective in controlling this type of development and minimising impacts than relying on other policies relating to design and amenity.

# Sustainability objectives

**Biodiversity (-)** The potential for adverse impacts on biodiversity should be recognised in the policy.

**Landscape character/Built Environment (+)** This policy should help control the location of new water based development to protect the open character of the foreshore and the built environment.

**Local economy (+)** In the correct location this policy permits new water recreation development, this type of development can help contribute to the local economy.

## Recommendations

The policy should recognise the potential for this type of development to have adverse impacts on biodiversity. Impacts could be through direct disturbance, increased visitors pressure or through changes in the beach characteristics.

## Issue DM11 – Dwelling mix

# Relationship of policy with sustainable development

To support demographically mixed communities all housing sizes should be catered for. However, the provision should reflect the demand in each area as Southend-on-Sea has a high proportion of single person households as well as a demand for family homes.

### Sustainability appraisal comment

Evidence shows that there may be a lack of family sized homes in Southend-on-Sea, although there are also a large number of single person households creating a demand for smaller homes. The policy seeks to ensure a mix of sizes of homes are provided in the Borough. This requires all housing sites to provide a mix of sizes, but specific targets set for affordable housing provision.

This policy should help deliver housing to meet the diverse needs of residents. However, in terms of maximising benefits it is not clear why the specific requirements are not extended to all housing (market and affordable), with ratios set through section 106 conditions. It could also be argued that setting this ratio of housing sizes is too blunt with different parts of the Borough characterised by very different housing types and needs and homes size will inevitably need to be adjusted in each location. Furthermore, to ensure the best use of land in accessible locations it should not be necessary to provide new family homes as houses but also as flats with sufficiently large communal living spaces to support family life.

# **Options**

The sustainability appraisal would support the same targets being set for affordable and market housing. The statement that 'this may not be appropriate on all development sites', should be equally applicable to affordable housing. As the policy states targets are negotiable and this should be true for market housing also where demands have changed.

Option 2 states that the lack of control on the size of new homes has led to a proliferation of one and two-bedroom properties. Many of these properties will be market housing, further highlighting the need for the policy to set ratios for all housing types to meet the needs of residents of all incomes.

Option 3 puts forward the option of not setting an housing mix for affordable homes. However, stating the ideal mix in policy provides a better starting point for negotiations on mix than having no target. Therefore, the suggested preferred option is most likely to be effective in delivering a mix, even if it is applied flexibly in some instances.

# Sustainability objectives

**Housing (+)** This policy is likely to provide a range of housing sizes to meet diverse needs, although it could be improved to further enhance this.

**Community (+)** Providing a range of housing sizes can have positive implications for supporting mixed communities and avoiding areas that are devoid of families.

### Recommendations

The policy should set the same standards for market and affordable homes to provide a mix of homes to meet all parts of the community.

The policy will need to be implemented flexibly to reflect the location of the development and the characteristics of the area.

The policy in conjunction with DM15 should allow for larger flats and not necessarily just houses in central and accessible areas.

## Issue DM12 - Affordable housing tenure

# Relationship of policy with sustainable development

Provision of various types of affordable housing can help meet the differing demands of people on lower incomes. Social rented accommodation will remain the most affordable and intermediate may help lower income households the opportunity to get on the housing ladder.

### Sustainability appraisal comment

This policy proposes a 70:30 split social rented to intermediate housing. Social rented housing will remain affordable in the long-term and will be the most affordable type of home. In Southend-on-Sea there is a lack of social rented housing, with private rental market making up the shortfall. However, as recognised elsewhere in the DPD private rental housing is often of a worse quality than modern affordable housing. Therefore, the policy could set targets for a higher proportion of social rented housing, this would make more of a contribution to making up for the current low availability of this type of housing and provide more equity in access to a good quality home for all residents. Intermediate housing is also important as it helps lower income households enter the housing market, which can be particularly difficult for single person households in the current market.

This policy should help people in Southend-on-Sea meet their housing needs.

### **Options**

Setting the split required as policy should help make sure sufficient housing is supplied as social rented.

An option of a higher proportion of social rented housing could be considered.

# Sustainability objectives

**Housing (+)** This policy has a positive relationship with this objective.

**Health, safety and security (+)** Access to good quality homes is an essential to being healthy and secure.

**Community (+)** This policy should help support a social demographic mix of people in Southend-on-Sea, supporting local communities.

### Recommendations

Intermediate housing could be defined in supporting text to the policy.

A higher proportion of social rented housing could help improve housing quality for renters.

# Issue DM13 – Retention of residential house types

### Relationship of policy with sustainable development

Houses need to be retained and delivered that meet the diverse and changing needs of Southend-on-Sea's residents and future residents.

### Sustainability appraisal comment

The principles of this policy relate well to sustainable development, such as providing homes that will meet the needs of the elderly and families. However, it may be difficult to justify this policy in some locations where single homes on larger plots could be replaced by multiple homes that would help meet housing needs in the Borough, making better use of available land. For example, residential retirement flats can provide a good alternative to living in bungalows for older people.

This policy may also be difficult to apply equitably across the area. Much may depend on its interpretation and definition of a 'sustainable neighbourhood', which may imply a mix of housing types or tenures.

## **Options**

Pursuing this option is unlikely to have any different impacts from the suggested preferred choice, as in each case the decision will be made on whether the home 'contributes to sustainable neighbourhoods'.

### Sustainability objectives

**Housing (?)** This policy will help protect some types of housing, but may have an impact on overall housing supply in the Borough.

**Community (?)** This policy may help support a social demographic mix of people in Southendon-Sea, supporting local communities.

### Recommendations

This policy could be combined with others such as DM3 'Intensification of Residential Areas' to avoid repetition.

## Issue DM14 – Residential space standards

# Relationship of policy with sustainable development

Small living space can have impacts on quality of life. This includes adverse impacts on family life, such as space for different needs of family members and private or quiet areas for children to complete homework or to relax in. Small living spaces can also adverse impacts on wellbeing for those without children.

Providing amenity space is important for health and wellbeing, and storage space to allow more living space and can assist with the better use of resources.

# Sustainability appraisal comment

This policy has positive implications for creating higher quality homes that provide a good place to live. The size standards should help avoid 'rabbit-hutch' style small homes and make sure homes with more bedrooms have associated increases in communal space to provide rooms for families. In addition storage space, waste storage, amenity space and drying space are all important parts of creating more sustainable development – relating to health, and reducing resource consumption.

It is possible that space standards will become mandatory for affordable homes, but the sustainability appraisal supports this policy as it includes market housing.

Evidence on the cost of meeting space provisions\* shows that for some multiple bedroom properties, the costs of meeting standards can be quite high. This may have an impact on the viability of development, possibly impacting on overall supply or making homes less affordable.

### **Options**

The suggested option is preferable to this option as it should ensure that homes are of a good minimum size wherever they are found in the Borough, and covers market and affordable housing.

### Sustainability objectives

**Housing (+)** This policy should help ensure new homes are of a good quality. There is the risk that this policy may hamper the delivery of some types of home based on viability.

**Health, safety and security (+)** A home that meets minimum size standards and with amenity space relates positively to this objective.

**Mineral and other raw materials (+)** Waste storage space in new homes will help encourage the sorting and recycling of waste.

**Energy sources (+)** Providing drying space can help reduce the use of tumble driers, therefore saving energy.

# Recommendations

None.

<sup>\*</sup> Preliminary study into the cost implications of proposed HCA space and design standards for Affordable Housing Residential Benchmarking – February 2010 (ref R2) Cyril Sweet

## Issue DM15 – Student accommodation space requirements

# Relationship of policy with sustainable development

The university and students are an important asset to the Borough. Supporting students by providing good quality and dedicated private accommodation can help make the town more attractive to them. In addition, dedicated accommodation may help reduce the amenity impacts of houses in multiple occupation elsewhere in the Borough.

### Sustainability appraisal comment

This policy supports good quality housing to meet the accommodation and study space needs of students.

### **Options**

This policy widens the universities own accreditation scheme for private landlords to ensure all new student accommodation is of a suitable quality. This approach to delivering these homes is preferable to decisions being made on a site by site basis.

# Sustainability objectives

**Housing (+)** This option will help provide suitable homes for students.

**Education and Skills (+)** Providing good quality student accommodation will help support the university and the standards should help ensure there is the study space necessary in rooms to meet needs.

**Community (+)** This policy may reduce the community amenity impacts of houses in multiple occupation elsewhere in the Borough.

**Local economy / wealth creation (+)**: Supporting students in Southend-on-Sea is important to the economy of the area now and in the future.

# Recommendations

None.

Appendix 1

## Issue DM16 – Houses in multiple occupation

# Relationship of policy with sustainable development

Houses in Multiple Occupation (HMO) make an important contribution to meeting housing needs in Southend. However, HMOs have the potential to have adverse impacts on local amenity. It is only recently (6<sup>th</sup> April 2010) that changes to the Use Classes order mean that houses changing from single occupancy to being rented to three or more people need planning permission.

### Sustainability appraisal comment

It is important to reduce some of the impacts of HMOs as rubbish, disrepair and parking problems can result from this type of development. These amenity issues can arise from many types of housing, include other private rented as well as owner occupied. However, in Southend-on-Sea the concentration of HMOs in some locations has had an adverse impact on the demographic mix, and therefore this policy can be used to prevent over-concentration happening in other areas.

HMOs play a vital role in providing much needed housing for students, young professionals and those on low incomes who rely on this type of affordable accommodation. These shared homes are often an initial step to independent living and managing a home. If this policy results in it being more difficult and costly for landlords to provide this type of accommodation, this policy may reduce choice for tenants and increase pressure on local authority social rented housing. Therefore, having a negative impact on provision of homes to meet a variety of needs and equitable access to housing.

Therefore, the policy need to be applied fairly to avoid adverse impacts on availability of accommodation and communities, with HMOs only restricted in areas that already have a large proportion of these types of homes.

### **Options**

To help secure the supply of this type of home decisions should be made on a site by site basis.

# Sustainability objectives

**Housing (-)** Potentially this option could reduce the amount of available housing in Southend-on-Sea and put pressure on the need for other types of affordable home.

**Community (?)** This policy may reduce some of the adverse impacts HMOs can have if improperly located. However, it may also reduce the demographic and social mix of communities.

**Land (-)** The policy may reduce the available housing supply in urban areas putting more pressure on greenfield land for development.

**Local economy (-)** Reducing the availability of this type of accommodation could have an impact on the available workforce in the Borough.

### Recommendations

The policy should be worded more positively to support this type of housing in the right areas.

To help make the DPD more succinct, this policy could be deleted as it is/could be successfully incorporated into other policy, such as design or minimum space standards.

# Issue DM17 – Specialist residential accommodation

# Relationship of policy with sustainable development

Housing to meet the needs of specific parts of the community is essential in providing equitable access to homes and encourage health and wellbeing.

### Sustainability appraisal comment

This policy should help support residential accommodation in the locations where it is needed. The policy should also allow future residents to have good access to shops and services without relying on a car or van.

### **Options**

NA

# Sustainability objectives

**Housing (+)** This policy, if not applied too restrictively, could help support new specialist or residential accommodation to meet the diverse needs of Southend-on-Sea's existing and future residents.

### Recommendations

To help make the DPD more succinct, this policy could be deleted as it is/could be successfully be incorporated into other policies on housing, design, amenity and parking.

### Issue DM18 – Network of centres

### Relationship of policy with sustainable development

Providing a range of service centres with facilities to reflect their role and location can help provide accessible walkable neighbourhoods. In addition, the policy does not allow development that would generate high numbers of daily trips outside the town and district centres, in keeping with the need to ensure public transport accessibility and reduce car dependency.

# Sustainability appraisal comment

This policy should help in meeting the sustainable development potential for the role of centres. The advantages of this policy approach are to support accessible services for all in a range of centres, including local centres. Limiting the development of high trip generating uses such as large leisure facilities and offices should help to support more sustainable travel choices, as these locations are the most easily access by a variety of methods of travel, including train.

## **Options**

The proposed approach is useful in delivering sustainable town centre development by stipulating what type of use is suitable for each type of centre.

## Sustainability objectives

Accessibility (+) This policy positively relates to this sustainability objective.

**Community (+)** Local centres providing shops and services of a suitable scale can be important neighbourhood hubs and meeting places, supporting local communities.

**Built environment (+)** Local centres and shops can often be part of the character of the built environment of neighbourhoods. Supporting the continued use of these areas at an appropriate scale is compatible with this sustainability objective.

**Wealth creation / local economy (+)** Maintaining and enhancing where necessary the centres of Southend-on-Sea is essential to wealth creation and the local economy.

### Recommendations

None.

# Issue DM19 - Shop frontage management

# Relationship of policy with sustainable development

Maintaining good quality shopping districts in towns is essential for sustainable development. These centres not only support more sustainable travel but also help maintain the vibrancy of a town and its attractiveness for visitors and potential investors.

### Sustainability appraisal comment

Controlling the use of the town centre to prioritise A1 uses is an important part of keeping the focus on the town centre for shopping. Retail is a high trip generating use and therefore focusing it in the most accessible location will help reduce the transport impact. In addition, ensuring a critical mass of shops in these locations will help maintain the town centre as a retail hub, successfully competing with out-of-town centres and maintaining vibrancy in the town

Well designed shop fronts that look attractive day and night will help maintain a high quality urban environment. It will be important to ensure that shop fronts, signage and fascias all make a positive contribution to the streetscape, avoiding development that is incompatible with the character of the area the principles of good design or encourage safety.

Allowing temporary uses of shops that have little chance of being let in the medium term can help improve the character of an area. 'Pop-up' shops and use as galleries can add vibrancy to a neighbourhood and area likely to positively help the image of an area without harm to the local economy.

### **Options**

Protecting retail uses in the town centre as the suggested preferred option is likely to be better in securing sustainable development than the alternative which would rely on the market.

### Sustainability objectives

**Accessibility (+):** Supporting retail development in the town centres will help retain these uses in the most accessible part of the Borough.

**Community (+):** Use of empty shops space for alternative functions could include cultural projects or other schemes to bring communities together, positively relating to this sustainability objective.

**Built environment (+):** Making sure shop fronts are of a good quality and contribute to the streetscene will help meet this objective.

#### Recommendations

None.

# Issue DM20 - Employment sectors

# Relationship of policy with sustainable development

Business can thrive as part of linked clusters. Protecting sites from incompatible business may help the continued functioning and growth of business clusters. Employment types that have a high job density, and therefore generate a high number of commuting trips, should be located in places that are accessible by a range of transport types to help reduce car use and associated adverse sustainability impacts.

# Sustainability appraisal comment

The town centre remains the focus for much office type development and cultural, creative and education employment. This centralised approach is compatible with sustainable development. The central area is accessible by a variety of modes of transport, including by train, and therefore encouraging businesses with high employee densities here can reduce car travel associated with out-of-centre locations.

Employment with potentially greater amenity impacts, such as manufacturing, is more suited to peripheral locations and on existing industrial estates. This location choice is compatible with sustainable development and protecting health and communities.

Specific business types, such as medical industries and aviation, are focused near existing uses of this type. The proposed policy could help support business clusters, protecting employment sites for associated business uses. This approach could help support the growth of these businesses, with Southend-on-Sea being associated with certain specialities.

### **Options**

The options presented are not in keeping with the identified employment pattern in Southendon-Sea. Therefore, alternative locations for employment sectors identified is unlikely to be suitable.

#### Sustainability objectives

**Accessibility (+)** This policy should help make sure new high job density employment development is located in accessible parts of the town, focusing on the town centre.

**Air (+)** Promoting development in accessible locations may help in reducing car travel. (NB there is the risk that some types of employment, e.g. in aviation, could have adverse air quality impacts – however, this is not a matter that can be controlled through development management policy).

**Local economy / wealth creation (+):** The policy supports economic growth in Southend-on-Sea, including the focus on the town's growth industries.

**Employment (+):** This policy supports a diverse range of employment types throughout the Borough, this should help provide a range of jobs in a range of locations to meet the needs of the workforce. Furthermore, the links of the university and medical industries may help match the skills of the workforce with the jobs available.

## Recommendations

None.

## Issue DM21 – Industrial estates and employment areas

# Relationship of policy with sustainable development

Protection of existing and designated employment land is essential due to limited land availability in the Borough and the competition from higher value land uses. The loss of the employment land supply will result in adverse economic impacts on the Borough and the loss of local employment. There may also be impacts from increased need to travel if more people have to travel outside the Borough for work.

# Sustainability appraisal comment

The planned change, renewal or protection of employment sites is based on a recent evidence report of the Southend-on-Sea Employment Land Review. Therefore, it is likely that the findings of the review are compatible with the long-term sustainable supply of land to meet employment needs. However, it is clear to meet modern standards and fulfil their full potential some sites will need to be updated and buildings renewed. Developing planning briefs for these sites should help make sure that future development is compatible with the needs of modern businesses and brings economic benefits to the Borough.

Allowing the redevelopment of some sites may be suitable where these sites are extremely underused or unsuitability located – either for the needs of business or causing a significant adverse amenity impact.

### **Options**

The proposed policy appears most suitable for securing sustainable economic development as it is based on the findings of the up-to-date employment land survey.

# Sustainability objectives

**Accessibility (+)** Protecting existing employment sites is likely to maintain accessibility, as transport networks are already established for these areas.

**Land (+)** Protecting employment from change of use will help make sure land is put to good use in the Borough, protecting the economic viability of the area.

**Local economy / wealth creation (+)** Supporting a range of employment sites will help protect the local economy and also ensuring where necessary these sites are updated to meet the needs of modern businesses.

**Employment (+):** This policy supports a diverse range of employment types throughout the Borough, this should help provide a range of jobs in a range of locations to meet the needs of the workforce.

### Recommendations

Policy could potentially address matters of importance to upgrading and the continued maintenance of employment areas and encourage the preparation of design briefs or masterplans. This could include: sustainable drainage, pedestrian and cycle links, ancillary uses on site, biodiversity and greening of employment areas, controls on hours of operation etc.

Preparation of development briefs will help ensure all sites continue to be developed or refurbished in a planned and cohesive way.

# Issue DM22 – Employment uses

# Relationship of policy with sustainable development

A range of employment sites are necessary to support the diverse needs of business, including start-ups, SMEs and growing businesses. Protecting existing sites from being lost to alternative land uses is essential as competition for land may mean these sites cannot be replaced.

### Sustainability appraisal comment

This policy should help make sure existing employment sites are retained for employment use and there is no loss in employment floorspace.

Retaining neighbourhood employment uses, even in predominantly residential areas, can help protect local jobs and the services necessary to serve communities.

Where existing employment uses are causing unacceptable harm to local amenity then an alternative use may be suitable. However, to protect local business and amenity, new vulnerable development should not be located near potentially disruptive employment uses. This restriction is important for sustainable development as if development does occur it will either result in poor residential amenity for new residents, or the employment uses being pushed out of the area to limit their impacts, with negative impacts for business.

# **Options**

The suggested preferred option presents more flexible approaches to managing employment land than the two alternatives. Therefore, this may be most suitable in responding to the characteristics of specific sites in specific locations and sustainable development in Southendon-Sea.

# Sustainability objectives

**Accessibility (+)** Maintaining a range of sites for employment, in and out of designated areas, is important to retain access to jobs in the local community.

**Community (+)** Local employment areas may be important to local community character.

**Land (+)** Retaining employment uses in existing quantities and locations is a good use of land to encourage a sustainable economy.

**Local economy (+)** Many employment sites are outside designated areas, maintaining these uses and a range of sites, is essential to protecting the local economy and encouraging economic growth.

**Employment (+)** Retaining employment land in Southend-on-Sea is essential to maintaining access to employment for residents.

**Wealth creation (+)** A range of employment sites is necessary to support the growth of local businesses and economic stability and growth in the area.

#### Recommendations

The policy could specify new ancillary uses in existing employment area should be of a suitable scale – this is to make sure not too much space is lost to alternative uses.

### Issue DM23 - Visitor accommodation

# Relationship of policy with sustainable development

Tourism is an essential part of the economy of Southend-on-Sea and one that is planned to grow. Encouraging more visitors stay overnight, rather than make day trips, will reduce the overall impact tourism trips can have on the environment, and encourage each visitor to spend more. This is likely to have positive sustainability impacts for the environment and the economy.

## Sustainability appraisal comment

This policy aims to protect existing visitor accommodation and encourage the development of new accommodation. The aim of the policy is for new accommodation to be provided where it is accessible by public transport. This is compatible with seeking more sustainable tourism as Southend-on-Sea has very good public transport access therefore for tourists and conference visitors there should be no need to travel by car.

Focused development on the Seafront and central area is also compatible with sustainability development. This is because these are the locations of the majority of retail and leisure facilities and the university. Therefore, accommodation here is most likely to be attractive to visitors and reduce car travel.

### **Options**

Specifically the suggested preferred locations for visitor accommodation is compatible with sustainable development. If option 1 is followed this could lead to a proliferation of accommodation on the outskirts of the town, incompatible with objectives for more sustainable travel.

Due to the changing needs of visitors it would be unsuitable to prevent any loss of existing visitor accommodation. However, test to show that the use is not viable should take into account the viability of the *site* and not necessarily only the *building*, especially in the principle tourism areas.

### Sustainability objectives

Accessibility (+) The policy aims to focus new visitor accommodation in accessible locations.

**Built environment (+)** The policy supports protecting of the character of the area.

Air (+) Encouraging new visitor accommodation in accessible locations could help reduce air quality impacts resulting from car travel.

**Local economy (+)**: This policy will support tourism essential to the local economy.

**Employment (+):** Encouraging more visitor accommodation can help support local employment, although many jobs in this sector can be poorly paid.

**Wealth creation (+)** Encouraging the tourism industry in Southend-on-Sea is an essential part of the economic growth plans for the area.

#### Recommendations

The policy could be more strongly worded to prevent new visitor accommodation being developed in peripheral locations that are not accessible by rail.

The policy could specify that viability tests on existing visitor accommodation considers the viability of the *site* and not necessarily the *building*, especially in the principle tourism areas.

The policy is not very clear on how different types of visitor accommodation will be encouraged, to avoid proliferation of too many similar types of hotel.

### Issue DM24 – Contaminated land

# Relationship of policy with sustainable development

To make the best use of available land it may be necessary to bring sites into use that may have been previously contaminated. Ensuring that new development does not take place until it can be shown that contamination risks have been identified and appropriately dealt with is essential in protecting people's health and safety as well as the natural environment.

### Sustainability appraisal comment

This policy is suitable for protecting new users of potentially contaminated sites from contamination risks. The policy may also help to use previously developed sites, making efficient use of land.

### **Options**

The alternative is to not include this policy. Relying on national policy is likely to be as good in achieving sustainable development as this policy.

# Sustainability objectives

**Health, safety and security (+)** Protecting people from the risks created by contaminated land is essential.

**Biodiversity (+)** During construction contamination in the soil can leach into ground, surface and sea water. This policy aims to identify contamination and deal with it appropriately, therefore reducing this risk and the risk to wildlife.

**Water (+):** During construction contamination in the soil can leach into ground, surface and sea water. This policy aims to identify contamination and deal with it appropriately, therefore reducing this risk and the risk to water quality.

**Land (+)** Reducing the contamination of sites is an important part of making efficient use of sites by making them available for alternative land uses.

**Soil (+):** This policy has a positive relationship with this objective.

#### Recommendations

To create are more succinct DPD this policy may not be needed, as contaminated land issues are well covered in national and regional policy.

# Issue DM25 – Land instability

# Relationship of policy with sustainable development

Protecting people and assets from the risks of landslip is essential for sustainable wellbeing and safety.

### Sustainability appraisal comment

This policy states that in areas where there may be a risk from land instability an assessment of risk will need to be submitted with a planning application. If necessary the policy also requires that construction must take into account land stability, this may require stabilisation works if necessary.

The policy may result in some housing or employment development being made unviable due to stabilisation costs. Protecting human safety is of overriding importance in these situations and the most sustainable option.

### **Options**

No alternatives are presented for this policy.

# Sustainability objectives

**Housing (?)** Land instability may also prevent residential development in some locations taking place if remediation is too costly making it unviable.

**Health, safety and security (+)** Protecting people from the risks of landslip is essential to meeting this sustainability objective.

**Built environment (+):** This policy will help protect existing and future built development from the risk of land instability.

**Local economy/wealth creation (?):** Unresolved land stability issues may have an impact on the local economy. Land stability may also prevent development in some locations taking place if remediation is too costly making it unviable.

# Recommendations

It is not clear if any types of development will have to financially contribute to stability works where they would benefit from this type of improvement.

# Issue DM26 – Sustainable transport management

# Relationship of policy with sustainable development

Sustainable transport and access can have a significant impact on achieving sustainable development. Schemes that help to reduce the number and need of trips by car can have a range of sustainability benefits. Benefits relate to:

- Reducing emissions to air, improving local air quality and contribution to climate change
- Improving health through better air quality and making walking and cycling an attractive option
- Helping equitable access to services for all, not putting those who cannot or do not own a car at a disadvantage
- Reducing congestion on the road from car travel can have benefits for the economy.

# Sustainability appraisal comment

The aim of the policy to help people make 'smarter choices' is supported in seeking more sustainable development. However, the policy wording is not very strong and therefore this policy may miss opportunities for really pushing for more sustainable travel choices to be a feature of all new development. For example the use of the word 'satisfactory' for the provision of non-car transport may not be strong enough to realise intended benefits. Wording the policy is a way that has the presumption in favour of public transport, walking and cycling access may be preferable. Similarly, implementing the criteria of the policy so development will not 'unreasonably harm' may be quite subjective.

### **Options**

No options are given.

### Sustainability objectives

**Accessibility (+)** This policy may help meet an objective of more accessible development. However, the policy could be improved to ensure that accessibility by non-car modes is improved.

**Health, safety and security (+):** If the policy is successful in reducing the amount of cars on the road (or the overall increase in car travel as a result of new development), then there may be positive implications for air quality and associated health benefits. This policy may also help encourage more healthy modes of travel, such as walking and cycling.

Air (+): If the policy is successful in reducing the amount of car travel (or the overall increase as a result of new development), then there may be positive implications for air quality.

**Energy (+):** The policy may help reduce the growth in car travel, therefore, reducing the energy consumption.

**Local economy / wealth creation (+):** Lower congestion from reducing car travel is likely to have positive impacts on the local economy and the attractiveness of Southend-on-Sea to investors.

# Recommendations

The policy could be more positively worded to be proactive in favouring non-car travel and the 'smarter choices' agenda.

More detail should be given on what type of development should prepare a Travel Plan and what the expectation of such a plan will be.

To help achieve the 'smarter choices' objectives this policy will need to be implemented alongside other strategies on parking management and improving public transport and cycling links.

### Issue DM27 – Vehicle parking standards

# Relationship of policy with sustainable development

Limiting car parking spaces can actively encourage more sustainable choices to be made on the need to travel and the choice of mode. Restricting residential spaces may be useful in some very accessible locations, but more importantly limiting spaces at destinations will encourage sustainable trips. Lower parking at office development or high density employment uses may be particularly useful, although this may need to be in tandem with parking management on streets in areas with a large amount of offices.

# Sustainability appraisal comment

This policy sets out the very detailed suggested standards for car parking for different Use Classes in Southend-on-Sea. The standards follow the guidance of the Essex Planning Officers Associate (EPOA), although do deviate from these standard to Southend-on-Sea. In the Central Area the provision of spaces is lower than in other parts of the Borough and EPOA standards, reflecting the relative accessibility of this area by non-car modes. These lower levels of provision are positive in aiming to reduce car use in this location and reduce congestion and environmental impacts.

Cycle parking standards are also set out in the policy. This is useful as it emphasises the importance of providing cycle parking as part of new development. Large development is still occurring nationally where cycle parking is well below demand adversely impacting on people's choice of travel and leading to inappropriately parked bikes. The policy should include details on how this cycle parking should be provided, for instance a proportion provided as extra secure, or the need for some locations to include changing facilities.

## **Options**

No options are presented, although more stringent standards could help further reduce car travel.

## Sustainability objectives

**Accessibility (+)** This policy should help to encourage access by alternatives to car travel, especially in the Central Area where standards are more stringent.

**Health, safety and security (+):** Encourage cycling will help improve health and wellbeing, although this will need to be conjunction with high quality segregated cycle routes and secure cycling parking to make sure cycling is safe. Reducing car travel will also help reduce health impacts from exhaust fumes.

Air (+): This policy may help to reduce car travel with benefits for health.

**Energy source (+):** If this policy is successful in limiting the growth of car travel it will help reduce fossil fuel consumption.

**Local economy / wealth creation (?):** The parking standards are not overly restrictive and should not harm the performance of businesses or the economy. Furthermore, if successful in reduce car travel this could reduce road congestion with benefits for the economy.

### Recommendations

The parking standards do differ slightly from those developed by the EPOA, therefore some additional information may be needed to justify these and ensure they stand up to scrutiny.

More detail should be given on how cycle parking is to be delivered, for example making sure this provision is secure.

To help achieve the 'smarter choices' objectives this policy will need to be implemented alongside other strategies on parking management and improving public transport and cycling links.



Appendix 1

# 1 Baseline information for the Seafront Area Action Plan

- 1.1 The primary source of information is the document 'Seafront Area Action Plan, Development Plan Document DPD4<sup>8</sup>, Draft Background Information and Evidence Base' which is simply a document which draws together key data and known information relevant to the Seafront. It was not intended to be exhaustive.
- 1.2 Work has now ceased on this AAP, with the policies on the seafront to be incorporated into the Development Management DPD.

#### Flood Risk

- 1.3 Government policy emphasises the need to ensure new development is protected from flood risk, primarily through location, but also through engineered defences and design. In sustainability terms flooding is a risk to human health/safety and economic growth, and can contribute to pollution through sewerage overflow and contaminated land.
- 1.4 Current indicative flood plains show a number of locations in the Borough that are 'at risk' from coastal flooding, including Two Tree island, and land north to Belton Hill, Leigh old town, Leigh old town to pier to the seafront road, inland areas east of through Southchurch Park and Thorpe Hall Golf Course, inland areas from Shoebury common through Gunners Park. The area in southern Southchurch, being heavily built up, is especially significant.
- 1.5 Flood risk in the Seafront AAP area extends the entire length of the coast, although existing flood and coastal defences protect against flood to a large extent, at times of severe storm and high water there is the risk that these defences could be over-topped causing flood. In most cases the flood risk area only extends a few meters inland impacting on roads and seafront development. However, east of the town centre near the Kursaal the flood risk extends into the residential areas near the cricket club and golf course to the railway line and beyond. Similarly, the redevelopment areas at Shoebury Ness former MOD sites is also at a higher risk of flood.
- 1.6 Indicative flood plain maps do not take into account existing flood defences in Southend Borough. Therefore, as long as the defences are maintained the actual risk is likely to be much lower than the indicative flood risk maps suggest. However, there remain small, but significant, areas of the Borough where a residual risk remains in the event of a breach in the tidal defences, or where issue with defence maintenance may cause them to fail.
- 1.7 The Thames Estuary 2100 plan identified that there are five schools, six care homes and 21 electricity sub stations within the flood risk area in the whole of Southend. This is an important amenity and recreation area, with a parallel road and footpaths along much of the frontage. The two main areas of floodplain are east of the town. The number of properties at risk is relative small, but the standard of protection is lower than elsewhere on the estuary, the flood risk is relatively high at 0.5% (or 1:200) per annum or greater (01.% for the rest of the estuary). Risks are of flood depths to 4m but this is very variable.

Appendix 2

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<sup>&</sup>lt;sup>8</sup> NB: Preparation of DPD4 has been cancelled, Seafront issues are now to be dealt with through the Development Management DPD.

### The Cliffs

1.8 The Cliffs are made up of London Clay. In the absence of other factors, slopes in London Clay will degrade naturally to a stable angle, which is between 8-10 degrees. The cliffs fronting the estuary at Southend vary from 12-30 degrees. Therefore it can be inferred that the cliffs are naturally unstable and would require man-made intervention that either lowers the angle or fixes the layers preventing deep seated movement. This instability has potential to impact on built development stability, as well as a potential risk to human health from subsidence and landslip.

### Air Quality

1.9 The main issue surrounding air quality is the increasing emissions from traffic on roads. Recent monitoring has indicated that levels of particulates and nitrogen dioxide within the Borough are currently within National Air Quality Strategy limits. The Essex Air Quality Consortium do not identify any particular air quality impacts of the roads in the Seafront area.

### **Bathing Water**

- 1.10 Southend-on-Sea has seven miles of beaches and bathing waters including four areas which have achieved International Blue Flag Awards in 2006. The majority of the Borough's bathing waters meet EU standards and are recognised as high quality. Six monitoring points in the Borough give data on water quality from 2003. With the exception of Leigh Bell Wharf, all of these achieved 'Excellent' standards in 2006. Since 2003 all of the monitoring areas have achieved 'Good' or 'Excellent' consistently.
- 1.11 The quality of water in the Thames Estuary is monitored under the Water Framework Directive, River Basin Management. This monitoring finds the ecological quality of the estuary is currently identified as 'moderate' and this is predicted to continue in the future (2015). The chemical water quality is currently failing to meet identified standards, as is predicted to continue to do so in the future (2015). The reasons for failure include hazardous substances in the water, including organic benzoate compounds. The water of the North Sea just outside the Thames Estuary is identified under the Water Framework Directive, River Basin Management, Coastal Waters as being of moderate ecological quality. Chemical quality passes the tests as being acceptable.

### **Biodiversity**

- 1.12 More comprehensive information on biodiversity can be found in the Sustainability Appraisal and the Habitats Assessment (including Appropriate Assessment) of the Core Strategy.
- 1.13 Although a predominantly urban authority area, the Borough has a range of habitats and protected areas. The Southend and Benfleet Marshes in particular are covered by a number of designations including, SSSI, Ramsar and Special Protection Areas (SPA), and this runs along the coast from the western boundary of the Borough to Shoeburyness. At Shoeburyness the nature conservation designations are the Foulness SPA as well as the Essex Estuaries Special Area of Conservation (SAC) all of which are also internationally designated Ramsar sites. In addition consideration

- needs to be taken of the likely effects on the interest of the Crouch and Roach Estuaries SPA and the Thames Estuary and Marshes SPA.
- 1.14 The Southend-on-Sea foreshore is a rich ecosystem that contains and supports a large number of invertebrate fauna including many species of Hydrobia snails, crabs, mudhopper crustations, molluscs, and worms. A number of microhabitats exist along the foreshore which is also an important habitat for birds.
- 1.15 As well as the foreshore, there are a number of lakes and ponds nearby, and water course and drainage ditches, these are important for their own wildlife functions, in urban areas ditches and rivers may act as wildlife corridors. Saltmarsh can be found to the south and east of Two Tree island and its a important conservation value is recognised by it inclusion in to a national nature reserve.
- 1.16 The Borough also has a number of other habitats of relevance including; seagrass, eelgrass, hedgerows, cliff top grasslands, and unimproved coastal grasslands. There is very little agricultural land within the coastal area.
- 1.17 More information on species types can be found in the core strategy Sustainability Appraisal and Habitats Assessment. Some important species of note include; Dark-Bellied Brent Goose, Skylark, Shrill Carder Bee, Stag Beetle, several species of bats, Dormouse, and a small Water Vole population.
- 1.18 All development in locations that may impact on the European sites will need to ensure it does not harm the integrity of these sites. Primarily by avoiding any impact, although it may also be possible for development to proceed where impacts can be full mitigated against.

## **Developed Coast**

1.19 The coastline of Southend-on-Sea is heavily urbanised along its length, with the exception of the western edge near the boundary of the neighbouring authority Castle Point. The Area Action Plan does not stretch very far inland at any point, predominantly covering the promenade and road and seafront buildings and open spaces. However, the implications of the AAP are wide reaching with approximately 46% of the population of the Borough living within 1km of the coastline and population density along the coast is higher than for the Borough as a whole.

## Travel, transport and movement

- 1.20 Many of the Borough's main road transport routes travel alongside or near to the coast. Road traffic counts show that from 2000-2005 road traffic has shown a steady increase on the Marine Parade, Chalkwell Esplanade, and Ness Road Shoeburyness, with levels increase by almost 37% on Chalkwell Esplanade, to 19,941 trips on average per day. This increase trend is unusual as many other roads in proximity to the foreshore have decreased. Cycle traffic has increased significantly on seafront cycle routes since 2000, up 55% particular as a result of the Sustrans route improvements. The entire length of the coast is also popular with walkers, although in some instances the route is in need of improvement, such as west of Chalkwell station where the railway line runs along the seafront.
- 1.21 There are a large amount of car parks on the seafront, ranging from the large Shoebury East Beach to smaller road side car parking for example at the Eastern

Esplanade and Marine Parade. There may be scope to rationalise car parking in some areas to make land available for other uses, including public open space and meeting places, as some key car parks are underused although usage depends on time of year and purpose of parking.

- 1.22 There are some transport proposals for the seafront that will have positive impacts for more sustainable transport, including improved cycleways and bus links along the coast. However some measured included in the Local Transport Plan, such as hovercraft and other river services from Southend have more unpredictable sustainability impacts, particularly if new port facilities are required due to likely impacts on the Natura 2000 sites.
- 1.23 The whole Seafront is already well served by public transport. However the quality of this varies, with all of the seafront east of the pier and at Leigh being within 400m of regular and frequent bus services. Other parts of the Seafront west of the pier to Leigh are not so well serviced. All of the seafront is within 1 mile of a station.

# **Built environment quality**

- 1.24 Many of the Borough's key landmark building are in the Seafront area covered by the AAP, as well as 11 conservation areas and many listed buildings of national importance, as well as those of local importance. Landmark buildings include the Pier, Palace Hotel, Royal Terrace, Cliffs Pavilion, and Crowstone House. There are also three scheduled ancient monuments, the Cold War Defence Boom, Shoeburyness (Danish camp) and World War II cassion.
- 1.25 There have also been recent improvements to the Seafront area, including the redevelopment of the entrance to the Pier at Pier Hill (Southend Central AAP), which has been recognised for its built quality, two houses on Undercliff Gardens, Allcoat House, Westcliffe Parade and the Kursaal restoration. Other parts of the Seafront contain long term redundant or under-used spaces in need of regeneration, some of which have produced strong responses from the local community, based on the type of development proposed or impacts on the surrounding area including nature conservation.
- 1.26 In addition, buildings along the seafront and bordering on the foreshore also in some instances suffer from poor built quality, and detract from the overall character.

### **Open Space and landscape**

- 1.27 In addition to the foreshore area the Seafront contains a range of public open spaces, predominantly used for informal recreation. This includes Gunners Park, Southend Cliffs and the Marine Parade Gardens. However, the continuing risk of landslips from the unstable cliffs means that it may be necessary to reconfigure some of the cliff parks.
- 1.28 Parks at the Seafront are noted for their landscape quality, for example the Hadleigh Marshes Special Landscape Area defined by the County. Although the purpose of the designation and the features being protected by require review as part of the LDF. Also of landscape value to the area is the open aspect onto the estuary from the coast, that gives Southend its distinctive characteristics and setting.

1.29 The Thames Gateway South Essex green grid strategy extends into Southend with the intention of linking up the green spaces of the area for various functions including recreation, biodiversity protection and enhancement, community connectivity, sustainable transport and creating high quality urban areas. Green spaces in Southend make up part of this.

### **Economy**

- 1.30 Tourism contributes about £255m to the local economy and supports 6,200 jobs (16% of employment in the Borough). Over 6 million day visitors visit Southend-on-Sea annually, making tourism hugely important to the local economy. Much of the development along the coast is specifically tailored to provide leisure and recreation facilities to tourists and visitors. The pier and amusement park, amusement arcades, and a theatre, amongst other attractions, are clustered on the Seafront.
- 1.31 In addition, some seafront properties are in use as overnight accommodation for visitors including bed and breakfast, hotels and self-catering accommodation. However, the quality of the hotel accommodation may be limiting the amount of overnight visits made for leisure, so improving the offer could raise the money spent by each visitor significantly. Figures produced in 2002 on the Economic Impact of Tourism is Southend revealed overnight visitors spend over £100 on average each, with day visitors spending under £25 each. Increasing spend through overnight stays is a more sustainable way of improving tourism revenue that encouraging more day visits. Improved summer weather may attract more people to holiday in the UK, and Southend should take advantage of these opportunities.
- 1.32 There are also no large conference facilities in the town and this may be an opportunity for the Borough as part of new development.
- 1.33 There is of course pressure on the coast for leisure uses including, seven boating clubs, three public slipways and 1200 mooring sites. The Southend-on-Sea central area has a large amusement park (Adventure Island) and the Southend-on-Sea pier, two major tourist attractions and local landmarks.
- 1.34 Retail and other employment uses are also found in the coastal zone, although a highlighted issue is the poor connectivity between the coastal area and the retail core of Southend-on-Sea. Unemployment varies in the coastal wards, with the majority having lower rates that the Southend average although Kursaal and Milton have significantly higher rates of unemployment than the Borough average whilst Leigh and West Leigh have very low rates in comparison.

### Housing

1.35 Most of the buildings in the Seafront area are residential, apart from in the central area where uses are more for leisure. A target for residential development in this area is set in the Core Strategy and includes a requirement for affordable homes. Progress towards meeting the dwelling provision figures for the seafront in the Core Strategy is quite rapid.

## Key issues in the Seafront AAP area

1.36 The additional scoping material gathered for the Seafront AAP identifies several matters that may need to be addressed by the SA. These are:

- much of the Seafront is at risk of flood according to Environment Agency maps, however flood defences should protect against this. Therefore maintenance of these is essential, in addition to ensure all new development where necessary has appropriate flood risk assessment before proceeding
- to protect public safety and existing built assets unstable cliffs needs to be engineered as appropriate to make stable
- air and bathing water quality of the Seafront should be maintained, or enhanced as necessary, through control of relevant development
- biodiversity and nature conservation is a key matter that needs to be considered through the AAP, and it will need to be ensured that new development does cause harm to European sites. New development should also help enhance the biodiversity quality of the Seafront area where appropriate
- reducing car use is a theme of planning in the Borough, and this must include the Seafront roads, provision of alternatives if necessary, including better bus services west of the pier and completion of the Sustrans cycle route
- car parking in the Seafront area needs some reorganisation to reduce underuse of car parks at all times of year and encourage visitors to use improved public transport and cycle routes. Land made available after reorganisation can be used for other purposes, such as public spaces or other leisure uses
- the built environment quality of the Seafront should be enhanced to provide a cohesive Seafront style, this will include regeneration of redundant sites but this must take into account impacts on biodiversity and take into account community views
- the AAP must support the South Essex Greengrid strategy
- the AAP should make particular provision for improving the overnight visitor accommodation on the Seafront to encourage longer stays and higher visitor spend. This could also include new conference facilities
- continued support needs to be given to employment provision and new housing in the Seafront area in order to meet objectives of the Core Strategy.

# 2 Baseline information for the Town Centre Area Action Plan

- 2.1 Several other key pieces of evidence are sources of information, these are:
  - The Southend-on-Sea gateway Town Centre Strategy 2002-2012
  - Consultation Framework Document 'Town Centre Study and Master Plan' Buro Happold/DTZ Pieda 2003
  - Southend-on-Sea Retail study CB Richard Ellis, September 2003.
- 2.2 For the purposes of collecting further evidence for the LDF, the council have defined the boundary of the town centre as the in the masterplan, to include administrative wards of Milton and Victoria. The SA uses data from these two wards as the basis for data collection on the social and economic characteristics of the area.

#### Role of the town centre

- 2.3 Southend-on-Sea town centre is a major retail, employment and commercial centre serving a catchment population of over 325,000 people. It lies at the heart of the Borough of Southend-on-Sea. The Town Centre is the Borough's most important commercial area and largest shopping centre, providing nearly 40% of the jobs in the Borough.
- 2.4 Retail is an important role of the town centre, with the shops focused on the High Street, forming a central spine through the centre from north to south. The High Street is pedestrianised linking the Victoria Plaza (1960s) and Royals (1980s) retail centres. On the periphery of the northern part of the High Street is the town centres only large food retailer and a major retail outlet offering non food goods. There is some question about the future of Sainsburys at this site, with the possibility to of the supermarket relocating to an edge of centre location.
- 2.5 The college and new university complex is adjacent to the High Street, with more development planned. Development of a multi-screen cinema, restaurants, café's and bars mainly along High Street side streets has given the town centre a complimentary leisure offer.
- Victoria Avenue is the main area for office accommodation. The Council views that Victoria Avenue has a number of 1960's office developments, some of which are outmoded for modern requirements.
- 2.7 The central area of the town also is the focus for much of the seaside leisure activity. With the entrance to the Pier at Pier Hill at the southern end of the High Street as well as the Adventure Island 'fun park'. The seafront area also includes the eastern and western esplanades and formal parks of the Southend cliffs.

### Housing

2.8 Extensive areas of high density housing providing homes for some 18,000 people (11% of the Borough total) in 10,000 households adjoin the centre. Housing areas around the high street are of historic and architectural quality and are designated as conservation areas<sup>9</sup>.

Appendix 2

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<sup>&</sup>lt;sup>9</sup> SBC, Town Centre AAP, Issues and Options Report

### **Travel and transport**

- 2.9 The town centre is accessed by two railway stations, Southend Victoria at the north end of the High Street and Central Station in the main shopping area. The newly refurbished bus station is also in the town centre, adjacent to the High Street. The main access by car is the A127 dual carriageway via Victoria Avenue and the A13 London Road, which has smaller and independent retail along it. The town centre has parking facilities for around 5,000 cars in surface and multi-storey car parks, Council owned car parking encourages short stay shoppers, but attempts to deter commuters through its pricing structure.
- 2.10 Cycling and walking routes are adequate, although there is potential for greater connectivity. The relatively flat character of the Southend topography means there is very good potential for more trips to be made by this mode. The seafront provides a particularly valuable connection of coastal neighbourhoods to the central Southend.
- 2.11 As previously noted in Section 3 there are also various schemes proposed through the Local Transport Plan 2 to bring enhancements to the public transport provision of the area.
- 2.12 All new development needs to support walking and cycling in the town centre, as well as the smooth flow of public transport and good quality interchange facilities. Linking the town centre to the seafront is also a key issue, and this will include linking the proposals and approach of this AAP and that for the seafront.

# **Population**

2.13 The 2001 Census of resident population provides the best population record at Ward level. There is some fluctuation in exact population dependant upon source. 2007 mid year population estimates from the ONS record a small increase in population. The Town Centre makes up 11.7 % (19,000) of the total Borough's resident population.

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Area	Census 2001	mid year estimate 2007			
Southend-on-Sea	160,293	162,000			
Town Centre	18,347	19,000			
Town Centre %	11.4	11.7			

Source: Census 2001 and Mid-year estimates (1981/2007) Southend-on-Sea Information Leaflets

## **Employment**

2.14 In 2005, the Town Centre provided nearly 40% of all the jobs in the Borough. The number of jobs in the Borough itself has increased by 2,600 between 2002 and 2005, with 92% of this increase provided in the Town Centre. This equates to an 11.1% increase in jobs in the Town Centre between 2002-05 compared to only a 4% increase in the number of jobs for the rest of Southend-on-Sea.

	2002	2003	2004	2005	%Change
Southend	60,400	61,600	64,800	63,000	4.3
Town Centre	21,600	23,000	25,100	24,000	11.1
% jobs in TC	35.8	37.3	38.7	38.1	

Source: Jobs totals are compiled through the Southend Business directory, Annual Business Enquiry and local knowledge. The datasets provides the most accurate post-census figures.

- 2.15 The Town Centre contains a mix of employment types, and some sectors are proportionately more significant than in the Borough as a whole. For example the financial sector (6.7% compared to 4.4%), real estate and business (20% compared to 17.2%) and 'other' (50.4% compared to 26.7%), retail is included in the 'other' category. In contrast, there are a number of sectors which are less important in the Town Centre than the Borough as a whole such as health and social work (6.3% compared to 21.8%), which is dependent on the location of hospitals, and manufacturing (2.1% compared to 10%) as only one industrial site is found in the area.
- 2.16 The unemployment rates in Southend show a sharp increase from 2008 to 2009 reflecting the global recession. The town centre has suffered particularly badly with the rate jumping well over 2 points, while the rest of Southend the increase is under 2. Figures from earlier in the decade show rates of unemployment disparity are closing, as it was over twice as high as the percentage for the rest of Borough.

**Unemployment rates** 

Onemployment rates		
	from May 2008	to May 2009
Town Centre	5.6	8.0
Rest of Southend	3.0	4.76

Source: 2008/09 Unemployment Monitor Summary Statistics – Issue 127 May 2009<sup>10</sup>

#### Social characteristics

- 2.17 Education rates show that although the rate of adults with no qualifications are higher in central Southend than for the Borough as a whole, there are also more residents with higher level qualifications. This may be as a result of younger professional people with qualifications living close to or in the town centre juxtaposed with pockets of deprivation, although without further investigation this cannot be confirmed.
- 2.18 The Town Centre is made up of Milton and Victoria wards, and also includes some parts of the Kursaal ward. The Indices of Multiple Deprivation 2004 indicate that where these three ward areas overlap with the commercial and retail centre of the Town Centre area there are high levels of deprivation, with sub-ward areas being in the 10% most deprived nationally, and others in the majority of the town centre, with the exception of some residential areas, being in the most deprived 30% nationally.

Appendix 2 3

The data used are claimant count levels collected by the Department for Work and Pensions. These data are a by-product of the administrative records of all people claiming benefits at Jobcentre Plus offices. The claimant count rate is calculated by expressing the number of people claiming unemployment-related benefits as a percentage of the estimated resident working-age population of the area. This figure is produced by the ONS Population Estimates Unit. Note, that the claimant count data relates to the number of benefit claimants only and therefore does not provide a comprehensive measure of unemployment.

2.19 The number of cars per household in central Southend is significantly lower (0.72) than for the rest of the Borough (1.09). This may reflect good transport connections but is also likely to be characteristic of income deprivation in parts of the centre.

### **Built environment quality**

- 2.20 Some of the town centre is currently of poor architectural quality, for example the low quality of the Farringdon multi-storey car park. Although recent regeneration, including the South East Essex College and University of Essex buildings, Pier Hill and the first phase of the Travel Centre have improved this, there is scope for further environmental improvements and making land available for alternatives uses.
- 2.21 The town centre area also contains many listed buildings and four conservation areas of consisting Prittlewell in the north, Milton and Clifftown in the south west, and Warrior Square located in the middle of the centre. The conservation areas are all predominantly residential neighbourhoods, and Clifftown directly borders the retail core of the town as well as the seafront. Listed buildings are within the town centre, particularly within the conservation areas, although are also found beyond the boundaries of these areas. Many of the listed buildings reflect Southend's heritage as a seaside holiday destination.

### Open space

- 2.22 There are only very limited areas of public open space, particularly green space, in the town centre. The seafront to the south of the town centre area does have high quality open spaces, in particular the Southend Cliffs formal gardens. However, within the main commercial and retail areas of the town centre green space provision is poor, and only really includes the cemetery behind the Royals shopping centre and Warrior Square (0.5ha). Neither of these areas are suited to informal recreational use, or as a place to take a break from other activities in the town centre. Churchill Gardens in the north of the town centre area provides additional open space, although is part of a more residential neighbourhood. Green spaces are needed in urban areas as demand will increase with a warming climate and these areas can help cool built urban areas, preventing 'heat island' impacts. Therefore, provision of green open spaces may be a matter to be addressed by the AAP.
- 2.23 Redevelopment of the centre and proposals of the AAP should take into account ways in which open spaces in this location can contribute to the Thames Gateway and South Essex Green Grid strategy.

#### Flood

2.24 Although there is a risk of flood along the seafront south of the town centre, the town centre itself is at no particular risk of flood. This is with the exception of the Kursaal area east of Southchurch Avenue which is at greater risk of flood according to Environment Agency maps.

## Air quality

2.25 The Essex Air Quality Consortium identifies that current air quality in Southend is below action levels. The main source of air pollution in Southend is road transport on busy road links such as the A127, A13 and A1159, and therefore in the Town Centre controlling traffic levels will be key to maintaining air quality. There are currently about

35 small scale industrial processes which are authorised by the Borough Council. These are not considered to emit significant quantities of air pollution.

#### **Nature conservation**

- 2.26 There are no sites of identified nature conservation importance in the central area. However, the potential for nature conservation enhancement should be a consideration of all development sites in the area.
- 2.27 The Town Centre is also near the internationally designated Natura 2000 sites, as referred to in Section 3. Therefore, development in these areas will have to ensure it will not have an adverse impact on these nature conservation sites. Potential impact pathways include sewerage, rainwater run-off, or pollution impacts of large scale new development, as well as any direct impact on the birds for which these areas are designated.

### **Key issues**

- 2.28 The additional baseline material gathered for the town centre AAP identifies several matters that may need to be addressed by the SA. These are:
  - development should help in the continued enhancement of the built environment in the town centre, with new buildings of high quality and developed to sound urban design principles
  - new urban open space, including new green space, could be provided in the town centre, this may be particularly important given the changing climate and the likelihood of even greater demand for outdoor social space
  - the area is currently experiencing high levels of deprivation, and this should be addressed through the AAP
  - the town centre is a focus of employment for the Borough, and this role needs to be maintained, while also ensuring a range of employment opportunities are maintained in a variety of employment sectors. It will also be necessary to ensure high quality jobs are provided
  - air quality of the town centre should be maintained
  - every attempt should made to bring biodiversity enhancements to the Town Centre, and also to ensure development in this area does not harm the nearby Natura 2000 sites
  - much of the Town Centre is used for car parking, the AAP should set out strategies for the rationalisation of town centre parking in order to allow land to be released for other uses and create a higher quality urban environment. In addition, establishing residents parking schemes in the neighbourhoods in proximity to commercial and office areas is necessary to reduce car commuting, in tandem with delivery of the Local Transport Plan proposals for improved public transport in and around the town centre.