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Our ref: AE/2006/000317/AP-
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Your ref: TP/100/480/2/ds
Date: 08 November 2010

Dear Ms Skinner

**Southend on Sea Local Development Framework – Development Management
and Southend Central Area Action Plan Issues and Options: HRA Screening
Reports**

Thank you for sending us the above documents for our consideration. Having reviewed the documents we have the following comments to make on the HRA Screening Reports.

Regarding both the Development Management and SCAAP Issues and Options HRA Screening Reports, we would concur with the conclusions at section 6 of each report. At this stage we would however also like to take the opportunity to highlight some key issues for consideration as the DPDs are brought forward, although we recognize that these will most likely be addressed through on-going processes.

As previously mentioned in response to consultations on both DPDs, all types of flood risk must be considered. This will include the management of surface water which should be through the inclusion of Sustainable Drainage Systems. In addition to flood risk reduction, SuDS have the potential to prevent any deterioration in water quality in the tidal Thames arising from further development in a combined sewer catchment, and could possibly deliver a marginal improvement.

Regarding the SCAAP HRA Screening Report specifically, we support the principles behind each of the recommendations listed. We would also like to add at this stage some additional comments in respect of future development at Western Esplanade. The proposals for development at that location include sailing (page 33). This will need careful consideration as an increase in sailing may mean that there will be associated proposals for new jettys and pontoons extending out across the Southend Foreshore protected sites (SPA, SSSI). All the conservation designations

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add protection to the unique foreshore area, which is adequately summarised in Natural England's SSSI designation, as mudflats which have a rich invertebrate fauna provides food for thousands of birds which over winter on the shoreline. Three bird species (dark-bellied goose, grey plover and knot) occur in internationally important numbers. Several other bird species also occur in nationally important numbers on the foreshore (e.g. dunlin and ringed plover).

Our National Encroachment Policy for Tidal Rivers and Estuaries includes a general presumption against tidal encroachment. Given this and the significant conservation value of the foreshore, it is likely that any proposals for tidal structures will have to demonstrate a high level of sustainability and provide significant environmental enhancements to the area for tidal development to be seriously considered in this location.

We would therefore support a 'no tidal encroachment' recommendation in section 6, to highlight a general presumption against new recreational facilities (e.g. pontoons etc) associated with sailing and water based activities on inter-tidal areas. Thorough ecological assessments would be required for any tidal encroachment development.

We will continue to contribute to the preparation of both DPDs to seek to ensure that appropriate environmental protection and enhancement will be secured.

If you have any questions in relation to this letter, please contact Jessica Bowden on 01473 706008, or jessica.bowden@environment-agency.gov.uk.

Yours sincerely

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