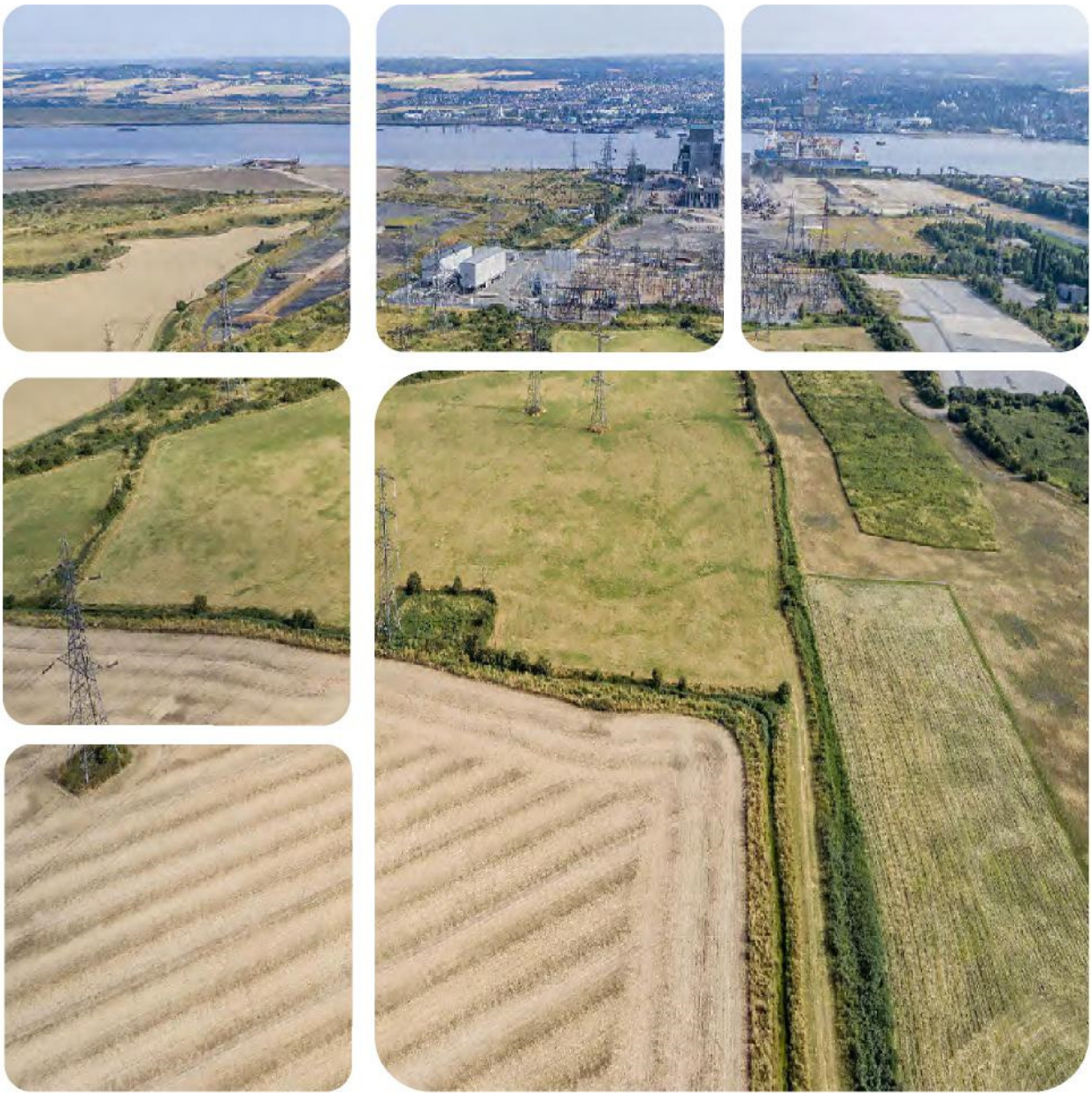
THURROCK POWER
A Statera Energy company

Consultation Report

Appendix 8.4: Consultation Responses

Thurrock Flexible Generation Plant

Application document number A5.1.8



Appendix 8.4 (Part 4 of 5)

All Consultation Responses 2018 – S47 continued

THURROCK POWER

Thurrock Power Flexible Generation Plant
Feedback Form

Please give your views

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1. In the accompanying letter if you received this form by post
2. Online at: www.thurrockpower.co.uk
3. At the following public consultation exhibitions:

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If you have any questions, would like this form in a different format or need assistance in giving your views, please telephone us on: 0207 1860580 or email us at: contact@thurrockpower.co.uk

It would be very helpful if you could answer the questions below: (Place a tick in the applicable box)

Had you heard of the Thurrock Power Flexible Generation Plant project before today?

Yes ☐ **No** ☑

Are you completing this form:

At an event ☐ **Online** ☐ **By post** ☑

4. Your Feedback

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5. Other Schemes in the Area

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Thank you for taking the time to read this. We hope it gives you a little of the background to our proposed scheme but, more importantly, a way to obtain further information and provide your feedback.

Finally, please note: requests for information about the proposed development in other formats (for example, large print or braille) will be considered upon request.

Yours sincerely

Andrew Troup
Director | Statera Energy Limited

Encs. Feedback Form
Blank Envelope to be used with Freepost Address: Freepost THURROCK POWER

The sources of energy used across the UK are becoming more diverse with renewable energy such as wind, wave and solar power helping to reduce reliance on fossil fuels and create a less polluting power supply. This makes the energy supply less predictable and we need to find ways to store the energy so it can be released when it is most needed. The Thurrock Power Flexible Generation Plant will provide this flexibility with its gas engines and allow energy to be stored in batteries and released into the electricity network when demand for energy is at its peak, thus creating a more stable electricity supply. This is particularly important in London and the surrounding areas due to population density.

Please provide any comments you have relating to the proposed development, as indicated below.

Do you have any comments to make on the potential benefits and/or impacts of the proposed development?

Do you have any comments on the information provided in 'have your say' and/or Preliminary Environmental Information Report?

Do you have any other general comments you would like to make about the proposed development or this consultation process? (Please continue on a separate sheet of paper if more space is required and fix this securely to your form before returning it to us)

THURROCK POWER

To help us understand feedback in more detail, please indicate whether you are (please tick all that apply to you):

A resident in the local area (if so, please give your postcode) RM16 4RT	✓
Employed in a local business	
Owner of a local business	
Owner of land connected with the proposed development	
A tourist or visitor to the area	
Giving feedback on behalf of an organisation (if so, please give the name of the organisation)	

THANK YOU VERY MUCH FOR YOUR FEEDBACK

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Name.....

Job Title (if responding on behalf of an organisation).....

Address.....

.....

Postcode.....

Email Address.....

Please tick this box if you would like to receive update emails: ☐

If you are completing this form at a public exhibition, please hand the completed form to a member of our team. If you received this form in the post please return it to us using the blank envelope provided and the Freepost address: Freepost THURROCK POWER

<u>The deadline for giving your feedback is 11.59pm on 14th November 2018</u>. Responses must be received by this time to guarantee they are given consideration.

Thurrock Power Limited

THURROCK POWER

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Yes ☑ **No** ☐

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Do you have any other general comments you would like to make about the proposed development or this consultation process? (Please continue on a separate sheet of paper if more space is required and fix this securely to your form before returning it to us)

Just hope that we have no further pollution than we have at this moment

THURROCK POWER

To help us understand feedback in more detail, please indicate whether you are (please tick all that apply to you):

A resident in the local area (if so, please give your postcode) BS18 7AL	✓
Employed in a local business	X
Owner of a local business	X
Owner of land connected with the proposed development	X
A tourist or visitor to the area	X
Giving feedback on behalf of an organisation (if so, please give the name of the organisation)	X

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Job Title (if responding on behalf of an organisation).....

Address.....

.....

Postcode.....

Email Address.....

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Director | Statera Energy Limited

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WHY ARE YOU BOTHERING TO WASTE MONEY ON A PUBLIC CONSULTATION? THIS PROJECT WILL BE RUBBER STAMPED FOR APPROVAL NO MATTER WHAT THE LOCAL RESIDENTS SAY OR DO! FOR EXAMPLE:

1. THE MONSTROUS AMAZON WAREHOUSE BUILT ON GREEN BELT.
2. THE LOWER THAMES CROSSING. THE ONLY PERSON WHO THINKS THIS IS A GOOD IDEA IS THE LOCAL M.P.!!!
3. THE TILBURY 2 PORT DEVELOPMENT.

Do you have any comments on the information provided in 'have your say' and/or Preliminary Environmental Information Report?

4. THE GIANT IMPORT & EXPORT CAR PARK & WAREHOUSE THAT IS SITUATED ON THE "FERRY FIELDS". WE WERE PROMISED SO MUCH IN RETURN FOR THIS BUT GOT VERY LITTLE.

THE LIFE EXPECTANCY OF RESIDENTS IS BEING SHORTENED BY THE POLLUTION IN THIS AREA. EIGHT TO TEN YEARS SHORTER.

Do you have any other general comments you would like to make about the proposed development or this consultation process? (Please continue on a separate sheet of paper if more space is required and fix this securely to your form before returning it to us)

WHAT WILL HAPPEN ABOUT THE WASTE TIP JUST TO THE EAST OF YOUR CONSTRUTION SITE WHICH DATES FROM THE 50'S & 60'S? THE B.B.C. 4 DOCUMENTARY CALLED THE SECRET LIFE OF A WASTE TIP STATED THAT IT WAS (QUOTE)

"AN ENVIONMENTAL TIME BOMB WAITING TO GO OFF"

PLUS YOU SAY THE GOVERNMENT ARE PUSHING FOR MORE HOUSING!

WOULD YOU WANT TO LIVE HERE?

THURROCK POWER

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Address.....

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Postcode.....

Email Address.....

Please tick this box if you would like to receive update emails: ☐

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Do you have any comments to make on the potential benefits and/or impacts of the proposed development?

No benefit to local Resident, there is air pollution already in Thurrock. There is health hazards to local Resident. This type of project should be move somewhere

Do you have any comments on the information provided in 'have your say' and/or Preliminary Environmental Information Report?

Thurrock, Th Tilbury Residence live span is Very low because of toxin and pollution in Tilbury Docks and energy Tilbury Area.

Do you have any other general comments you would like to make about the proposed development or this consultation process? (Please continue on a separate sheet of paper if more space is required and fix this securely to your form before returning it to us)

Health Hazard is likely to effect the people of Tilbury considering large number of local people and new relocation of people from London due to expansion. We need work and development in Tilbury NOT POWER PLANT.

THURROCK POWER

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Name.....Local Resident in Tilbury.....

Job Title (if responding on behalf of an organisation).....

Address.....Tilbury RM18.....

.....

Postcode....RM18 2L....

Email Address.....—.....

Please tick this box if you would like to receive update emails: ☐

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Please provide any comments you have relating to the proposed development, as indicated below.

Do you have any comments to make on the potential benefits and/or impacts of the proposed development?

I feel that it is a necessary installation as we are very dependent on power. My main concern is the environmental impact, although I am told this will be negligable!

Do you have any comments on the information provided in 'have your say' and/or Preliminary Environmental Information Report?

Not yet read

Do you have any other general comments you would like to make about the proposed development or this consultation process? (Please continue on a separate sheet of paper if more space is required and fix this securely to your form before returning it to us)

Thurrock again.

THURROCK POWER

To help us understand feedback in more detail, please indicate whether you are (please tick all that apply to you):

A resident in the local area (if so, please give your postcode) RM16 4XS	
Employed in a local business	–
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Name.....S. CONWAY.....

Job Title (if responding on behalf of an organisation).....

Address.....36 STANFORD ROAD.....

.....GRAYS.....

Postcode.....RM16 4XS.....

Email Address.....

Please tick this box if you would like to receive update emails: ☐

If you are completing this form at a public exhibition, please hand the completed form to a member of our team. If you received this form in the post please return it to us using the blank envelope provided and the Free Post address: THURROCK POWER

<u>The deadline for giving your feedback is 11.59pm on 14th November 2018</u>. Responses must be received by this time to guarantee they are given consideration.

Thurrock Power Limited

THURROCK POWER

Thurrock Power Flexible Generation Plant
Feedback Form

Please give your views

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1. In the accompanying letter and if you received this form by post
2. Online at: www.thurrockpower.co.uk
3. At the following public exhibitions:

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West Tilbury	West Tilbury Village Hall, Rectory Road, West Tilbury, RM18 8UD	Tuesday 23rd October 2018	11am to 8pm
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Linford	Linford Village Hall, Lower Crescent, Linford, SS17 0QP	Wednesday 7th November 2018	11am to 5.30pm

If you have any questions, would like this form in a different format or need assistance in giving your views, please telephone us on: 0207 1860580.

It would be very helpful if you could answer the questions below: (Place a tick in the applicable box)

Had you heard of the Thurrock Power Flexible Generation Plant project before today?

Yes ☐ **No** ☑

Are you completing this form:

At an event ☐ **Online** ☐ **By post** ☑

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Do you have any comments on the information provided in 'have your say' and/or Preliminary Environmental Information Report?

Re: the "temporary" haul road between St Chad's Road and Gunhill Rd, this would not be temporary but would remain for use as and when required.

During construction HGVs would be travelling from the A1089 to this new road, negotiating the two mini roundabouts and pedestrian crossing which are provided at the school

Do you have any other general comments you would like to make about the proposed development or this consultation process? (Please continue on a separate sheet of paper if more space is required and fix this securely to your form before returning it to us)

entrances, thus increasing the danger of accidents to the school children and cars exiting the school. This totals 3 mini roundabouts including the one near Biggin Lane.

We believe this haul road should not be allowed on the grounds that it would be creating unnecessary extra danger when alternative routes could be used.

THURROCK POWER

To help us understand feedback in more detail, please indicate whether you are (please tick all that apply to you):

A resident in the local area (if so, please give your postcode) RM16 4LT	✓
Employed in a local business	
Owner of a local business	
Owner of land connected with the proposed development	
A tourist or visitor to the area	
Giving feedback on behalf of an organisation (if so, please give the name of the organisation)	

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Name S J & H J CRONIN

Job Title (if responding on behalf of an organisation)

Address JENOLAN, BIGGIN LANE

CHADWELL ST MARY

Postcode RM16 4LT

Email Address

Please tick this box if you would like to receive update emails: ☐

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Had you heard of the Thurrock Power Flexible Generation Plant project before today?

Yes ☐ **No** ☒

Are you completing this form:

At an event ☐ **Online** ☐ **By post** ☒

4. Your Feedback

A feedback form is enclosed with this letter. Feedback forms will also be available at the public exhibitions, on the project website and at the deposit locations within the consultation zone listed above, or by telephoning, emailing or writing to us using the details in paragraph 3, above. We encourage you to complete and return this form by email or by Freepost to allow you to have your say about the proposed development. Alternatively, you can simply write to us by email or Freepost with your comments.

If you are able to attend one of the public consultation exhibitions, members of the Thurrock Power project team will be present to answer any questions you may have. Copies of the 'have your say' document and feedback forms will also be available for you to take away with you, along with DVD copies of the PEIR.

We will take your comments into account and explain how we have done so in a Consultation Report, which will be submitted with our application for Development Consent once the consultation process has been completed.

Please note that all responses and feedback forms must be received by Thurrock Power by the closing date of 14th November 2018. We cannot guarantee that feedback received after this date will be considered.

5. Other Schemes in the Area

You may be aware of National Grid's major substation on Tilbury Marshes, which has provided the grid connection for Tilbury power station in the past. This connection point remains in place as a critical National Grid facility on the electricity network. This is why RWE has located its Tilbury Energy Centre and Thurrock Power its flexible electricity plant, near to this substation. The two schemes are independent of each other but in many respects are complimentary and will do much to provide resilience to the electricity system.

We recognise that there is a lot of development going on in the area alongside these two proposed energy projects, not least the Tilbury 2 port development, the proposed Lower Thames Crossing and the Government pushing for more land for housing. We have therefore made sure that we understand what all these developments mean together and what our proposal adds to the potential impact.

Thank you for taking the time to read this. We hope it gives you a little of the background to our proposed scheme but, more importantly, a way to obtain further information and provide your feedback.

Finally, please note: requests for information about the proposed development in other formats (for example, large print or braille) will be considered upon request.

Yours sincerely

Andrew Troup
Director | Statera Energy Limited

Encs. Feedback Form
Blank Envelope to be used with Freepost Address: Freepost THURROCK POWER

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Do you have any other general comments you would like to make about the proposed development or this consultation process? (Please continue on a separate sheet of paper if more space is required and fix this securely to your form before returning it to us)

THURROCK POWER

To help us understand feedback in more detail, please indicate whether you are (please tick all that apply to you):

A resident in the local area (if so, please give your postcode)	X RM16 4QH
Employed in a local business	X
Owner of a local business	
Owner of land connected with the proposed development	
A tourist or visitor to the area	
Giving feedback on behalf of an organisation (if so, please give the name of the organisation)	

THANK YOU VERY MUCH FOR YOUR FEEDBACK

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Name: Miss Tanya Dudley

Job Title (if responding on behalf of an organisation):

Address: 57 Claudian Way
Grays Essex

Postcode: RM16 4QH

Email Address: tdudley241@btinternet.com

Please tick this box if you would like to receive update emails: X

If you are completing this form at a public exhibition, please hand the completed form to a member of our team. If you received this form in the post please return it to us using the blank envelope provided and the Freepost address: Freepost THURROCK POWER

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Had you heard of the Thurrock Power Flexible Generation Plant project before today?

Yes ☐ **No** ☑

Are you completing this form:

At an event ☐ **Online** ☑ **By post** ☐

THURROCK POWER

4. **Your Feedback**

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THURROCK POWER

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Had you heard of the Thurrock Power Flexible Generation Plant project before today?

Yes ☒ **No** ☐

Are you completing this form:

At an event ☐ **Online** ☐ **By post** ☒

THURROCK POWER

To help us understand feedback in more detail, please indicate whether you are (please tick all that apply to you):

A resident in the local area (if so, please give your postcode)	RM16 4QX
Employed in a local business	
Owner of a local business	
Owner of land connected with the proposed development	
A tourist or visitor to the area	
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Name.....Valerie Gibbs.....

Job Title (if responding on behalf of an organisation).....

Address.....30 MALPAS RD.....

.....C.S.M.....

Postcode.....RM16 4QX.....

Email Address.....N/A.....

Please tick this box if you would like to receive update emails: ☐

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Do you have any comments to make on the potential benefits and/or impacts of the proposed development?

Seems okay.

Do you have any comments on the information provided in 'have your say' and/or Preliminary Environmental Information Report?

Not read yet. Just received it.

Do you have any other general comments you would like to make about the proposed development or this consultation process? (Please continue on a separate sheet of paper if more space is required and fix this securely to your form before returning it to us)

No, but reassured at this stage

THURROCK POWER

To help us understand feedback in more detail, please indicate whether you are (please tick all that apply to you):

A resident in the local area (if so, please give your postcode) RM17 6AJ	✓
Employed in a local business	
Owner of a local business	
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Name.....VERONICA GIBBONS.....

Job Title (if responding on behalf of an organisation).....

Address.....40 OVERCLIFF RD.....

.....GRAYS.....

Postcode.....RM17 6AJ.....

Email Address.....

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Thurrock Power Limited

MR D. WEBSTER
86 BURCH ROAD
NORTHFLEET
GRAVESEND
KENT DA11 9NE

PLEASE SEND ME A COPY OF YOUR 'HAVE YOUR SAY' DOCUMENT AND A FEEDBACK FORM

MANY THANKS

Kirsty Cassie

From: Andrew Troup
Sent: 16 November 2018 13:22
To: Stephanie Boswall; Kirsty Cassie
Subject: Consultation response.
Attachments: Carter0001.pdf

I have spoken to Paul Carter (07976 944038), owner of Coalman Cottage (indicated on plan) and explained that we are only talking about traffic lights. Very friendly. Obviously most concerned about LTC.

Andrew Troup
Director | Statera Energy Limited
1st Floor | 145 Kensington Church Street
London | W8 7LP
Mob: 07778027385
Email: atroup@stateraenergy.co.uk
www.stateraenergy.co.uk

Appendix 8.4 (Part 4 of 5)

All Consultation Responses 2019 – Non-Statutory

ESSEX FIELD CLUB

www.essexfieldclub.org.uk

registered charity no 1113963

The Essex Field Club is a natural history organisation founded in 1880 to promote the Study of the Natural History, Geology and Pre-historic Archaeology of the County of Essex and its borderlands and included Charles Darwin and Alfred Russel Wallace as founder members.

Thurrock Flexible Generation Plant

We are pleased to see that the previous construction haul route, south of Biggin Lane and Th38 Broom Hill Thames Terrace Grassland LoWS, has been replaced in the new proposals by new proposals to the south.

The Zone G corridor for causeway and temporary haul road is potentially an improvement, but there is a crucial need to ensure there is no negative impact on the nationally important invertebrate fauna of what remains of the ashfield area, something that should have been clear from a fit-for-purpose desk study, which unfortunately was not undertaken, see next section.

The desktop study

As we have previously explained, unfortunately the desktop study described in Appendix 9.1 of the Ecological Desk Study and Surveys document completely fails to fulfil its purpose as a desk study and the Consultation on Project Changes does not alter this situation. Paragraph 2.1.1 states that Ecological records within a 2 km radius of Zones A-J (as shown on Figure 1.1) were requested from the Essex Wildlife Trust Biological Records Centre and the Kent and Medway Biological Records Centre. As made clear in Natural England's Invertebrate Standard Advice for Essex and the Essex Biodiversity Validation Checklist published by Essex County Council, supported by Natural England's local Land Use Operations team and endorsed by the Essex Biodiversity Project, a Preliminary Ecological Appraisal (PEA) of an application site should include a biological records search of the application site and this should encompass a number of biodiversity features as a minimum, <u>including the Essex Field Club's Datasearch facility (on behalf of the Essex Recorders partnership) as the main source of species records</u>. The Essex Recorders partnership provides access to the county records of the Essex Field Club county recorders, Essex Amphibian and Reptile Group, Essex Bat Group and the Essex Birdwatching Society, as well as county geological information.

This means the desk study and desk study species data shown in Appendix 9.1 remains completely inadequate, not fit-for-purpose and fails to fulfil any useful purpose. The utter failure of this is evidenced in Table 3.4: Summary of protected and notable invertebrate species recorded within 2 km of the Phase 1 survey area, where only "*Several insect species with some rarity / conservation status have been recorded within 2 km of the Phase 1 survey area*" are presented, when there should be a massively greater number. The idea stated in the Ecology chapter paragraph 2.2.1 that information on ecology and nature conservation within the desk study search area was collected through a "*detailed desktop review of existing datasets*" is quite evidently hopelessly inaccurate. It means that the fundamental basis of everything that has been presented to date on ecology and especially invertebrates is hardly worth the paper it is written on. The Consultation on Project Changes should have addressed this but has failed to do so.

Yet based on this completely flawed information, paragraph 2.2.7 states that in order to inform the assessment, the site-specific surveys did not include invertebrates. The extent of land outlined in figure 2.2. for the invertebrate scoping survey is stated in paragraph 2.4 to appraise the invertebrate habitats present on the Main Site (Zone A) and to assess whether the proposed development would have an impact on invertebrate ecology, yet figure 2.2 appears to make clear that this only included

Zone A and did not included any other areas involved. It is difficult to see how this can assess whether the proposed development would have an impact on invertebrate ecology. There is also no report provided of the invertebrate scoping survey, so we have no information on which to judge its effectiveness for even the scoping survey for this single zone. The idea presented in paragraph 2.4.5 that the baseline ecological surveys are therefore considered to be appropriate to inform a robust impact assessment of the Thurrock Flexible Generation Plant does not stand up to scrutiny.

Unfortunately no evidence is provided in the new consultation that these failures have been addressed and incorporated into surveys. Until the invertebrate scoping survey report and details and reports of surveys undertaken since the 2018 consultation are made available and full details of offsite mitigation proposals are made, then an informed and adequate consultation response remains impossible.

Cumulative effects

The Tilbury Power plans add to the cumulative loss of nationally important invertebrate habitat areas on Tilbury Power Station land for Tilbury 2, excavation of the majority of the adjacent ashfields on the east side, the loss of the extensive Goshems Farm habitats to 'restoration' and the Lower Thames Crossing route to suggest there will be a large scale destruction of the nationally important invertebrate fauna of the Tilbury area and the possible extinction of the regional metapopulations of a number of the Priority species currently present. This cumulative impact on the landscape is not recognised in Chapter 18: Summary of Cumulative Effects, which therefore does not actually address cumulative effects at all: the *Adverse impact to Lytag Brownfield Local Wildlife Site* uses Tilbury2 port expansion and the Lower Thames Crossing to suggest that "*No cumulative impact as the Local Wildlife Site effect is entirely due to these two developments, and hence the Thurrock Flexible Generation Plant would not contribute to the cumulative effect*". This ignores the cumulative effect of the Tilbury Power proposals on populations surviving at the wider surrounding landscape level. In the same way the "*Adverse impact of cumulative projects resulting in greater fragmentation of populations of protected species*" is stated to be entirely due to the presence of the Lower Thames Crossing link road and the Thurrock Flexible Generation Plant would not contribute additional fragmentation effects. This again ignores the cumulative effect of the Tilbury Power proposals on populations surviving at the wider surrounding landscape level. So how is Chapter 18: Summary of Cumulative Effects addressing cumulative effects? There is also no evidence presented to support these claims. The impact of Zone G corridor for causeway and temporary haul road has not been considered at all, despite the presence here of a known nationally important invertebrate fauna of the ashfield area certainly still extant in 2018.

Common land exchange land

Parsonage Common is an ancient landscape feature that may have been grassland for many centuries, although war-time ploughing on some parts cannot be ruled out. Whilst it represents quite extensive, if rather species-poor, grassland which is unlikely to currently be particularly valuable for its biodiversity, it does represent an increasingly important part of the nature conservation landscape for the nationally important invertebrate fauna of the Tilbury area and it will form part of the landscape that supports the regional metapopulations of a number of the threatened Priority species currently surviving in the south Essex region.

We are pleased to see that part of the field (F2) between West Tilbury Hall LoWS / Hall Hill and Parsonage Common adjacent to Cooper Shaw Road has been included as habitat compensation and enhancement land, together with the smaller section (F1) to improve continuity with the proposed new Common Land (E) on former arable. However the use of arable land as Common Land replacement will require a high degree of work to create compensation habitat that could in any way provide significant biodiversity compensation or biodiversity gain. Such habitat creation would take a good many years before it could make a valuable contribution to the invertebrate ecology of the wider landscape. We are concerned with the suggestion in Project Changes Report paragraph 4.6 that "*The works on the habitat enhancement areas are likely to include ditch creation, stripping of some of the topsoil (some of which can be used for construction of bee banks)*". Nature conservation land and bee banks both need the use of nutrient-poor substrate to allow the

development and long term survival of species-rich communities. The suggested bee banks should use nutrient-poor substrate and the proposed replacement Common Land and habitat compensation areas should have **all** the topsoil stripped, and removed off site.

We remain of the view that a much better alternative or addition for off-site compensation land would be the field on the north side of the nationally important Broom Hill LoWS (Th 38), which would create a valuable landscape area between Hob Hill and Turnpike Lane. Such a scenario would make an extraordinarily important contribution to the invertebrate assemblages of the region. There may be other locations in the south Essex region which would also provide valuable ,itigation / compensation, but these need to be identified before an informed consultation response can be meaningfully made.

Please keep us informed of progress on the proposals.

Yours sincerely

Peter Harvey, for Essex Field Club, 11 November 2019
Please reply to: 32 Lodge Lane, Grays, Essex RM16 2YP

contact

From: Rob Dyer <rob.dyer@kentandessex-ifca.gov.uk>
Sent: 28 October 2019 14:44
To: contact
Cc: Annabel Plumeridge
Subject: Consultation - Proposed Flexible Generation Power Plant in Thurrock

Dear Sir/Madam,
Thankyou very much for your letter dated 9th October 2019 regarding the Consultation under Section 42 of the Planning Act 2008 for the proposed flexible generation plant in Thurrock.

I note that Kent and Essex IFCA was originally excluded from the 2018 consultation for this project as there was no marine component, however subsequently you have incorporated plans which do include marine components, specifically:
"A new permanent causeway into the River Thames will be constructed and used during construction for the delivery of very large and indivisible loads by water".

As far as I can tell from the EIA document on your website, dated September 2018, no consideration has been given to the impacts of such a causeway on the marine environment. I can see from the figure included with your letter of 9th October (Doc No. 10872-0005-18) that you have highlighted an area of shoreline approximately 500m long for the construction of this causeway. However, you have provided no information regarding the construction planning, the scale of the impact on the soft sediments of the Thames shoreline, nor the impact of such construction on the existing environment.
Additionally, I would question why the causeway itself is being proposed as a permanent structure if the purpose is purely to allow delivery of components during the construction process. If the existence of the causeway is indeed as a temporary solution to a transport issue during construction, why are there no plans to restore the area following completion of the project?

I would very much appreciate a response to these issues as without any detail on the marine impacts of your project I am unable to adequately provide you with any consultation response. With your current EIA, as posted on www.thurrockpower.co.uk I would not be able to state that I have no concerns regarding the delivery of the project.

Yours sincerely,
Rob Dyer

Rob Dyer | Lead Scientific and Conservation Officer
Email: rob.dyer@kentandessex-ifca.gov.uk
Web: www.kentandessex-ifca.gov.uk

Kent and Essex Inshore Fisheries and Conservation Authority
The Sail Loft, Shipyard Estate, Brightlingsea, Essex CO7 0AR
Tel: 01206 303261 | Mob: 07428 070704

contact

From: John Lee <John.F.Lee@kier.co.uk>
Sent: 12 October 2019 09:02
To: contact
Subject: FW: Development Consent Order
Attachments: DOC111019-11102019125708.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sir / Madam

In response to your attached copy letter I can confirm that that we have no land/property in that area to my knowledge, either McNicholas Rail Limited/legacy McNicholas or the Keir Group.

I can confirm that the proposed works will be affected by the KPN apparatus, you will need to forward all documentation to kpn.plantenquiries@instalcom.co.uk and they will be able to assist.

Kind Regards

John

John Lee
Asset Manager

Kier Property | 33 Foley Street | London | W1W 7TL
M: +44 777 569 7137 | www.kier.co.uk/property
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Our values are enthusiastic, collaborative and forward-thinking

Kier Property Developments Limited I Registered in England No. 00873695
Registered Office: Tempsford Hall | Sandy | Bedfordshire | SG19 2BD

From: Sandra Lakin
Sent: 12 October 2019 08:52
To: John Lee <John.F.Lee@kier.co.uk>; McDonnell, Jennifer <Jennifer.McDonnell@Kier.co.uk>
Subject: RE: Development Consent Order

Hi John/Jennifer

This is a plant enquiry request.

As their proposed works will be affected by the KPN apparatus, they will need to forward all documentation to kpn.plantenquiries@instalcom.co.uk and they will be able to assist.

Thanks

Sandra

Sandra Lakin
Careline & PDM Manager

Kier Utilities & Rail | Tempsford Hall | Sandy | Bedfordshire | SG19 2BD
T: 01923 366 017 | M: +44 781 030 5179 | www.kier.co.uk
Connect with us I follow us on LinkedIn | follow us on Twitter |
Our values are enthusiastic, collaborative and forward-thinking

Kier Integrated Services Limited I Registered in England No. 873179
Registered Office: Tempsford Hall | Sandy | Bedfordshire | SG19 2BD

From: John Lee
Sent: 12 October 2019 07:48
To: McDonnell, Jennifer; Sandra Lakin
Subject: FW: Development Consent Order

Good morning Jennifer

I am of the same opinion as Adam that we have no land/property in that area to my knowledge, either McNicholas Rail Limited/legacy McNicholas or the Keir Group.

I have copied our Sandra Lakin in on this who will be able to advise/assist on a response to the letter attached. It may be that we have dealt with assets (utility/plant), or still do, that the former McNicholas Rail Limited/legacy McNicholas or Keir Group have/had in the area.

Hi Sandra

Please can you assist any response to the letter attached in relation to the scheme referenced please. I am not aware of any land or property that we have or had an in interest in the area being referenced

Many thanks

Kind Regards

John

John Lee
Asset Manager

Kier Property | 33 Foley Street | London | W1W 7TL
M: +44 777 569 7137 | www.kier.co.uk/property
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Kier Property Developments Limited I Registered in England No. 00873695

From: McDonnell, Jennifer [mailto:Jennifer.McDonnell@kier.co.uk]
Sent: 11 October 2019 13:37
To: John Lee <John.F.Lee@kier.co.uk>
Subject: Fwd: Development Consent Order

John,

Does this look familiar to you?

Kind regards,

Jennifer
Get Outlook for iOS

From: Highwood, Adam <Adam.Highwood@kier.co.uk>
Sent: Friday, October 11, 2019 1:20:48 PM
To: McDonnell, Jennifer <Jennifer.McDonnell@kier.co.uk>
Subject: Development Consent Order

Jennifer,

The enclosed letter was received in Tempsford addressed to McNicholas Rail regarding a development consent order which affects land that the company has an interest in.

Not sure who should be dealing with this, I'm not aware of any land or property which the Rail business has an interest in in this location.

Can you suggest who is best placed to identify the rightful recipient of the letter.

Regards,
Adam

-----Original Message-----
From: ian.frost <ian.frost@kier.co.uk>
Sent: 11 October 2019 12:59
To: Frost, Ian <Ian.Frost@kier.co.uk>; Highwood, Adam <Adam.Highwood@kier.co.uk>
Subject: Scan images from Toshiba copier 11/10/2019 12:58

Scanned from MFP07562297
User Name: ian.frost
Date:11/10/2019 12:58
Pages:26

Resolution:300x300 DPI

Kirsty Cassie

From: Hugh Craddock <hughcraddock@oss.org.uk>
Sent: 27 November 2019 15:24
To: Kirsty Cassie
Subject: RE: Thurrock Power - Further Consultation

Dear Kirsty

Thank you for your reminder email below, and for the consultation letter dated 18 October.

We note the revised proposals, particularly in relation to the provision of a link between the replacement common land, located north of the railway line, and Fort Road (and therefore with the residential area west of Fort Road). We welcome this, and assume that the link would itself be designated as common land, and capable of registration as such.

The land would be subject to a public right of access under s.193 of the Law of Property Act 1925 (it being located within the former Thurrock urban district). It would also become subject to the rights for access, games and reasonable recreation under the order and award made under the Commons (West Tilbury) Provisional Order Confirmation Act 1893. However, it seems to us that mere designation as common land, and public rights of access, do not ensure that the link is provided. In particular, the requirement for a bridge over the drain on the east side of Fort Road, demands something more.

Our view, at this stage, is that a requirement for a footbridge could be made a condition of the development consent order, but invite your comment.

We also note that a short length of road at Buckland is designated as a temporary footpath diversion route (J on the zone plan). However, this appears to lie along Buckland Lane, which is a public road maintainable at public expense.

regards

Hugh

Hugh Craddock
Case Officer
Open Spaces Society
25a Bell Street
Henley-on-Thames
RG9 2BA
Email: hugh@oss.org.uk
www.oss.org.uk
Tel: 01491 573535
Please note that I work Mondays, Wednesdays and Thursdays
(Registered in England and Wales, limited company number 7846516
Registered charity number 1144840)

From: Kirsty Cassie [mailto:KCassie@stateraenergy.co.uk]
Sent: 22 November 2019 09:47
To: Hugh Craddock
Subject: Thurrock Power - Further Consultation

Dear Hugh

Thurrock Power Limited (a Statera Energy Group Company)
Proposed Flexible Generation Plant in Thurrock
Consultation with Open Spaces Society on Project Changes

You are receiving this email to follow up on the recent formal consultation on project changes to the proposed Thurrock Power Flexible Generation Plant, which ran from 11th October to 11th November 2019.

Thurrock Power Limited and the Open Spaces Society have, of course, been engaged in ongoing discussions in relation to iterative design of the project. However, I am now making contact with you because you are one of the organisations which has not yet provided formal consultation feedback on the proposed project changes.

We are keen to engage with you and I should be grateful if you would confirm receipt of the consultation letter (and enclosures) sent to you on 9th October 2019 and indicate whether you are intending to provide any formal feedback.

If you would like to discuss any aspect of the proposed project changes or have any questions, please do not hesitate to contact me by phone (0207 1860580) or by email (atroup@stateraenergy.co.uk).

Kind regards

Andrew Troup
Director

Thurrock Power Limited
1st Floor | 145 Kensington Church Street
London | W8 7LP
Tel: 02071860580
Email: contact@thurrockpower.co.uk
Website: www.thurrockpower.co.uk

contact

From: David Bowling <bowling.d7@gmail.com>
Sent: 13 October 2019 08:55
To: contact
Cc: David Bowling
Subject: proposed development by Thurrock power ltd (stratera energy) East Tilbury

Sent from Mail for Windows 10
FAO Mr TROUP , Sir I find with a huge amount of dismay that this project appears to have popped up from the ether . I find a map which I am yet to understand which shows my property inside two red lines . As the vice chair of the Welcom forum and an active community volunteer with the local first responders I am flabbergasted that you purport to have carried out a public consultation in 2018 . Whilst I was aware of letters coming from stratera energy to residents in west tilbury bought and minuted in our forum meeting . I had talks With RWE and was aware of their intentions and knew stratera energy may have a desire to build a “support station” to RWE however I now find a map in existance which gos straight through my property . having looked at some maps I fail to understand how your proposed build will fit in with the proposed lower thames crossing , Thurrock council have failed to communicate any of your proposals to the Welcom forum and I would ask how long you have been in talks with them please , At this moment in time with the lower thames crossing and large developments combined with lack of infrastructure such as accessible roads this is the last thing this community wants or needs . I take it you are aware of the tilbury dust result and our fight for clean air . I attend patients with copd on a regular basis , Whilst I dispute the validity of your public consultation in 2018 . I will be formulating an official objection to the council , yourselves and the secretary of state with my councillors and member of parliament . I Personally have been unable to sell my house with the lower thames crossing hovering and now with this on top I have no chance . I note you run several similar companies , I would invite you to our next forum meeting the 31st of October 2019 at Linford church hall 7pm . I look forward to your reply
David Bowling

Appendix 8.4 (Part 4 of 5)

All Consultation Responses 2019 – S42 Statutory (up to Colt Technology Services)

Strategic Growth and Public Policy
Anglian Water Services Ltd
Thorpe Wood House,
Thorpe Wood,
Peterborough
PE3 6WT

Tel 07973780531
www.anglianwater.co.uk

Freepost THURROCK POWER
[Sent by e-mail]

11 November 2019

Dear Sir/Madam,

Thurrock Power Limited (a Statera Energy Company)
Proposed Flexible Generation Plant in Thurrock
Consultation on Project Changes

Thank you for the opportunity to comment on the Thurrock Power Limited Proposed Flexible Generation Plant Consultation on Project Changes. Anglian Water is the sewerage undertaker for the above site. The following response is submitted on behalf of Anglian Water.

General comments

We note that the focus of the current consultation is a result of project design changes to the Non-Technical Summary ('NTS') that formed part of the original Preliminary Environmental Information Report. The following comments should be read together with our earlier response to the Phase 2 consultation for the above project.

The site layout plan which was provided with the original October 2018 consultation has been subject to changes. The particular alteration that Anglian Water is commenting on focuses on the reduction of Zone D, the corridor for the gas pipeline and the unchanged section of Zone C. We note that Zone D in the October 2018 plan has been significantly reduced and is now termed Zone D1-2, this reduction is a result of the gas pipeline route being refined. Anglian Water welcomes this refinement as it results in the re-positioning of the gas pipeline route away from underground Anglian Water assets.

We do however note that Zone C, the corridor for permanent access road, gas pipeline route, and construction laydown remains unchanged from the October 2018 plan.

Registered Office
Anglian Water Services Ltd
Lancaster House, Lancaster Way,
Ermine Business Park, Huntingdon,
Cambridgeshire. PE29 6YJ
Registered in England
No. 2366656.

an AWG Company

There are existing rising mains (pressurised sewers) located within the proposed site boundary, particularly within this Zone C corridor. We would ask that further consideration be given to how the location of Anglian Water's existing water recycling infrastructure will be considered as part of the site layout.

Where it is not possible to avoid existing infrastructure we would wish to have further discussion about any requirement to divert existing sewers as appropriate.

Please find attached protective provisions specifically for the benefit of Anglian Water.

We would welcome further discussions with Thurrock Power Ltd relating to the wording of the Draft DCO including any proposal to obtain rights over land in Anglian Water's ownership prior to the application being submitted.

Should you have any queries relating to this response please let me know.

Yours sincerely

Stewart Patience

Stewart Patience

Spatial Planning Manager

APPENDIX 1 - RECOMMENDED PROTECTIVE PROVISIONS FOR THE BENEFIT OF ANGLIAN WATER

FOR THE PROTECTION OF ANGLIAN WATER

(1) For the protection of Anglian Water, the following provisions shall, unless otherwise agreed in writing between the undertaker and Anglian Water, have effect.

(2) In this part of this schedule –

"apparatus" means any works, mains, pipes or other apparatus belonging to or maintained by Anglian Water for the purposes of water supply and sewerage and

(a) any drain or works vested in Anglian Water under The Water Industry Act 1991,

(b) any sewer which is so vested or is the subject of a notice of intention to adopt given under section 102 (4) of The Water Industry Act 1991 or an agreement to adopt made under section 104 of that Act,

and includes a sludge main, disposal main or sewer outfall and any manholes, ventilating shafts, pumps or other accessories forming part of any sewer, drain, or works (within the meaning of section 219 of that Act) and any structure in which apparatus is or is to be lodged or which gives or will give access to apparatus.

"alternative apparatus" means alternative apparatus adequate to enable Anglian Water to fulfil its statutory functions in not less efficient a manner than previously;

"functions" includes powers and duties

"in" in a context referring to apparatus or alternative apparatus in land includes a reference to apparatus or alternative apparatus under, over or upon land; and

"plan" includes sections, drawings, specifications and method statements.

(3) The Company shall not interfere with, build over or near to any Apparatus within the Order Land or execute the placing, installation, bedding, packing, removal, connection or disconnection of any apparatus, or execute any filling around the apparatus (where the apparatus is laid in a trench) within the standard protection strips which are the strips of land falling the following distances to either side of the medial line of any relevant pipe or apparatus;2.25metres where the diameter of the pipe is less than 150 milimetres,3 metres where the diameter of the pipe is between 150 and 450 millimetres,4.5 metres where the diameter of the pipe is between 450 and 750 millimetres and 6 metres where the diameter of the pipe exceeds 750 millimetres unless otherwise agreed in writing with Anglian Water, such agreement not to be unreasonably withheld or delayed,

and such provision being brought to the attention of any agent or contractor responsible for carrying out any work on behalf of the Company.

(4) The alteration, extension, removal or re-location of any apparatus shall not be implemented until

(a) any requirement for any permits under the Environmental Permitting Regulations 2010 or other legislations and any other associated consents are obtained, and any approval or agreement required from Anglian Water on alternative outfall locations as a result of such re-location are approved, such approvals from Anglian Water not to be unreasonably withheld or delayed; and

(b) the Company has made the appropriate application required under the Water Industry Act 1991 together with a plan and section of the works proposed and Anglian Water has agreed all of the contractual documentation required under the Water Industry Act 1991, such agreement not to be unreasonably withheld or delayed; and such works to be executed only in accordance with the plan, section and description submitted and in accordance with such reasonable requirements as may be made by Anglian Water for the alteration or otherwise for the protection of the apparatus, or for securing access to it.

(5) In the situation, where in exercise of the powers conferred by the Order, the Company acquires any interest in any land in which Apparatus is placed and such apparatus is to be relocated, extended, removed or altered in any way, no alteration or extension shall take place until Anglian Water has established to its reasonable satisfaction, contingency arrangements in order to conduct its functions for the duration of the works to relocate, extend, remove or alter the apparatus.

(6) Regardless of any provision in this Order or anything shown on any plan, the Company must not acquire any apparatus otherwise than by agreement, and before extinguishing any existing rights for Anglian Water to use, keep, inspect, renew and maintain its apparatus in the Order land, the Company shall, with the agreement of Anglian Water, create a new right to use, keep, inspect, renew and maintain the apparatus that is reasonably convenient for Anglian Water such agreement not to be unreasonably withheld or delayed, and to be subject to arbitration under article 59.

(7) If in consequence of the exercise of the powers conferred by the Order the access to any apparatus is materially obstructed the Company shall provide such alternative means of access to such apparatus as will enable Anglian Water to maintain or use the apparatus no less effectively than was possible before such obstruction.

(8) If in consequence of the exercise of the powers conferred by the Order, previously unmapped sewers, lateral drains or other apparatus are identified by the company, notification of the location of such assets will immediately be given to Anglian Water and afforded the same protection of other Anglian Water assets.

(9) If for any reason or in consequence of the construction of any of the works referred to in paragraphs 4 to 6 and 8 above any damage is caused to any apparatus (other than apparatus the repair of which is not reasonably necessary in view of its intended removal for the purposes of those works) or property of Anglian Water, or there is any interruption in any service provided, or in the supply of any goods, by Anglian Water, the Company shall,

(a) bear and pay the cost reasonably incurred by Anglian Water in making good any damage or restoring the supply; and

(b) make reasonable compensation to Anglian Water for any other expenses, loss, damages, penalty or costs incurred by Anglian Water

by reason or in consequence of any such damage or interruption.

contact

From: Charles Sweeny <Charles.Sweeny@basildon.gov.uk>
Sent: 30 October 2019 15:48
To: contact
Subject: Thurrock Flexible Generation Plant Section 42 Consultation - Proposed Changes
Attachments: image001.png

Dear Sir/Madam,

Thank you for giving Basildon Borough Council the opportunity to comment on the proposed changes to the flexible generation peaking plant. Having reviewed the changes, Basildon Borough Council have no further comments to make.

Regards
Charles

Charles Sweeny MRTPI
Specialist Development Management Practitioner | Planning Services| Basildon Borough Council

DD: 01268 207933 | Tel: 01268 533333 | www.basildon.gov.uk
Facebook: @basildonboroughcouncil | Twitter: @BasildonCouncil

From: Charles Sweeny
Sent: 30 November 2018 12:40
To: contact <contact@thurrockpower.co.uk>
Cc: Geraldine Paul <Geraldine.Paul@basildon.gov.uk>
Subject: RE: Thurrock Flexible Generation Plant Section 42 Consultation

Dear Kirsty,

Thank you for giving Basildon Borough Council the opportunity to comment on the proposals. Having reviewed the documents, the key issue for Basildon Borough Council will be regarding air quality and whether the proposal will result in any adverse implications on wider air quality improvement objectives within the Borough.

I trust these comments will be taken into consideration as the scheme develops.

Regards
Charles

Charles Sweeny MRTPI
Specialist Development Management Practitioner | Planning Services| Basildon Borough Council

DD: 01268 207933 | Tel: 01268 533333 | www.basildon.gov.uk
Facebook: @basildonboroughcouncil | Twitter: @BasildonCouncil

From: contact [mailto:contact@thurrockpower.co.uk]
Sent: 26 November 2018 10:55
To: Geraldine Paul <Geraldine.Paul@basildon.gov.uk>
Subject: RE: Thurrock Flexible Generation Plant Section 42 Consultation

Dear Geraldine,

Thank you for being in touch. Please find attached Section 42 Letter along with the Section 48 Notice. The Preliminary Environmental Impact Report along with all other consultation material can be found under the documents tab on the Thurrock Power website (www.thurrockpower.co.uk).

If you wish to issue a response please do so within 14 days.

Kind regards,

Kirsty
Kirsty Cassie
Statera Energy Limited
1st Floor | 145 Kensington Church Street
London | W8 7LP
Tel: 02071860585
Mob: 07854618041
Email: kcassie@stateraenergy.co.uk

From: Geraldine Paul <Geraldine.Paul@basildon.gov.uk>
Sent: 23 November 2018 12:31
To: contact <contact@thurrockpower.co.uk>
Subject: Thurrock Flexible Generation Plant Section 42 Consultation

Dear Sirs,

Basildon Council would be very grateful if you could send the links to the above consultation as our senior planning officer would like to offer our comments.

I apologise for any inconvenience caused.

Yours faithfully,

Geraldine Paul
Technical Support Officer for Planning Services, Basildon Borough Council
Direct dial: 01268 208154
Main Switchboard: 01268 533333 | www.basildon.gov.uk
Facebook: @basildonboroughcouncil | Twitter: @BasildonCouncil

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contact

From: louise.harris@bt.com
Sent: 05 November 2019 15:51
To: contact
Subject: FW: Thurrock Power Ltd - Proposed Flexible Generation Plant in Thurrock; Consultation on Project Changes - Deadline for receipt of responses: 11 Nov 2019
Attachments: thurock power ltd - proposed flexible grneration plant in thurrock.pdf

Hi There,

We have received the attached letter regarding consultation on the development. We have no properties affected in the area but it is likely there is some Openreach Cabling. This letter has been sent onto Openreach separately.

Kind regards
Louise

Louise Harris BSc (Hons) MRICS
Property Professional
Property & Facilities Services

M: +447483340949
E: louise.harris@bt.com

From: Bishop,H,Hilary,WPN2 R
Sent: 21 October 2019 15:57
To: Harris,L,Louise,WPN2 R <louise.harris@bt.com>
Cc: Brown,T,Terry,WPN1 R <terry.brown@bt.com>
Subject: FW: Thurrock Power Ltd - Proposed Flexible Generation Plant in Thurrock; Consultation on Project Changes - Deadline for receipt of responses: 11 Nov 2019

Louise

BT have no property affected and Terry has forwarded to Openreach to make their own representation. I will leave you to formally respond on behalf of BT Property

Hilary Bishop
Property Professional
Property & Facilities Services

M: +44 7889 045851
E: hilary.bishop@bt.com

From: Brown,T,Terry,WPN1 R
Sent: 21 October 2019 14:00
To: networkalterationsuk T <networkalterationsuk@openreach.co.uk>
Cc: Harris,L,Louise,WPN2 R <louise.harris@bt.com>; Bishop,H,Hilary,WPN2 R <hilary.bishop@bt.com>
Subject: FW: Thurrock Power Ltd - Proposed Flexible Generation Plant in Thurrock; Consultation on Project Changes - Deadline for receipt of responses: 11 Nov 2019

Hi,

Please see attached.

Please note that I am forwarding this Notice onto Openreach as external mail received by BT Property & Facilities Services that may be of interest to, or may impact on Openreach installations. Any resultant queries which you may have need to be addressed to the originator of the Notice and not back to me.

Thank you,

Terry Brown
Lease Administration Professional
Property & Facilities Services

M: +44 7484 079750
E: terry.brown@bt.com

From: Heldt,RBE,Rhonda,CGLP R
Sent: 15 October 2019 15:59
To: Brown,T,Terry,WPN1 R <terry.brown@bt.com>

Subject: FW: Thurrock Power Ltd - Proposed Flexible Generation Plant in Thurrock; Consultation on Project Changes - Deadline for receipt of responses: 11 Nov 2019

NB: Maps can be posted if required.

From: Rhonda

Rhonda Heldt
Legal Support

PP: 0.10D – Ground Floor Legal Area; Faraday Building; 1 Knightrider Street; London; EC4V 5BT
BT Legal | Tel: 020 7322 4829;

Email: rhonda.heldt@bt.com

Please click on the Admin Front Door here to raise a request: 

From: Heldt,RBE,Rhonda,CGLP R
Sent: 15 October 2019 15:54
To: Heldt,RBE,Rhonda,CGLP R <rhonda.heldt@bt.com>
Subject: Email From MFD

contact

From: Cashman, Vicky <vicky.cashman@cadentgas.com>
Sent: 29 October 2019 12:35
To: contact
Cc: Oliver Troup; Bowling, Tom
Subject: Thurrock Flexible Generation Plant DCO - Project Changes

Dear Sirs,

Thank you for your letter dated 9th October 2019 regarding the proposed project changes and updated red line boundary for the Thurrock Flexible Generation Plan DCO. I can confirm that having reviewed the updated boundary, Cadent no longer have any assets affected by proposals and therefore wish to make no further comments.

Kind Regards
Vicky

Vicky Cashman
Consents Officer, Land Services
Central Operations
Cadent
07747671508
Enabling the here and now for our customers, whilst shaping future commitments

---

Regeneration and Neighbourhoods
Castle Point Borough Council
Council Offices, Kiln Road,
Thundersley, Benfleet,
Essex SS7 1TF
Tel: 01268 882200

contact@thurrockpower.co.uk

Date: 6th November 2109

K. Fisher-Bright Extn 2381

Your Ref:

My email:
Kfisher@castlepoint.gov.uk

Dear Sir

Proposed Flexible Generation Power Plant in Thurrock
Statutory Consultation under S. 43 of the Planning Act 2008

In response to your consultation of the 9th October 2019, in respect of the above proposal, please find below the response of this Council.

The Authority has been consulted on changes to the previously advised proposal for the Thurrock Flexible Generation Plant, proposed adjacent to the Tilbury Power Station, following consultation on the original proposal in October and November 2018.

Whilst the description of development and main construction site boundary remains the same, amendments are proposed around the site, in respect of construction roads, access to public highways and open space, areas required for the connection of the plant to the national grid, the refinement of the gas pipeline alignment, habitat compensation and carbon capture requirements.

The proposal also now includes the provision of a permanent causeway into the River Thames which will be used for the delivery of very large and abnormal indivisible loads by water.

The proposed alterations to the project would appear to have merit and no direct adverse impact on Castle Point.

This Authority does not therefore wish to object to the proposal.

Yours sincerely

K.P.Fisher Bright
Kim Fisher-Bright

Da Vinci House
44 Saffron Hill
London EC1N 8FH
tel: +44 (0)20 3640 8508
fax: +44 (0)20 3435 4228
email: info@iceniprojects.com
web: www.iceniprojects.com

11th November 2019

15/087
BY EMAIL

Dear Sir/Madam,

REPRESENTATIONS TO THE THURROCK POWER DEVELOPMENT CONSENT ORDER (DCO) CONSULTATION

Iceni Projects is instructed by Cogent Land LLP ("Cogent") to submit representations as part of the formal statutory consultation process being undertaken by Thurrock Power Ltd. ("the Applicant") to inform the Development Consent Order (DCO) application for the proposed Flexible Generation Plant at Thurrock (the "Proposed Development"). This consultation response is made pursuant to Section 42 of the Planning Act 2008.

Cogent have been consulted as they have a legal interest in Land at East Tilbury which is expected to be directly affected by the proposals. A map showing the extent of Cogent's land interests are shown on the map included at **Enclosure 1**.

The purpose of this statement is to set out our comprehensive position based on the information presented so far.

a. Summary of Representations

Cogent do not object to the principle of the DCO scheme, however, we believe that the further work needs to be undertaken to fully assess the impacts of this development on the surrounding area, in addition, the alternatives assessment should consider alternative routes that would avoid land, such as Cogent's land, that is being promoted for delivering much needed housing.

Our main concerns are summarised below:

- **Safeguarding and Exclusion Zone** – although the red line boundary sets out the order limit it is not clear whether this land is to be permanently acquired through the CPO process or if the Applicant is seeking permanent rights over the land for maintenance and access or whether this is needed for construction activities only;

- **Site Accessibility** – the layout of the Proposed Development could result in significant reductions in the developable area due to restrictions and clearances in the vicinity of high pressure gas pipelines;

- **Assessment of Alternatives** – the information provided does not clearly demonstrate that the land selection process is based on a robust and objective assessment of alternative options;

- **Adequacy and Access to Information** – there have been no further updates to the environmental information since October 2018;

- **Cumulative Effects** – there is no reference to the consideration of the wider masterplan promoted by Cogent throughout the Local Plan process;

- **Ecology** – the Habitats Regulations Assessment should be updated as the detailed design of the Proposed Development progresses;

- **Heritage and Views** – there are numerous heritage assets and views in the surrounding area which need further assessment once the design progresses; and

- **Nuisances** – the Site is located in proximity to residential dwellings and other community assets (including schools) and therefore noise and vibration and air quality impacts during the construction and operational phases need to be considered.

b. Background

These representations are submitted in respect of land at East Tilbury which is in multiple ownerships. Cogent is an option holder on each land parcel alongside a wider area of land as shown in **Enclosure 1**.

The subject land is located within the Green Belt and currently comprises agricultural land. Combined, these sites comprise almost 185 hectares and have the potential to deliver a minimum of 3,000 dwellings and associated infrastructure. Cogent have been promoting Land at East Tilbury for development throughout the Local Plan process for a number of years and via a planning application (ref.16/01232/OUT). A summary of the consultation responses and consultation undertaken to date is provided in **Enclosure 2**.

Cogent's land interests fall within Zones D and E of the Proposed Development site which comprise the corridor for the gas pipeline and an area of land within which an above-ground installation (AGI) for the connection of the gas pipeline to the gas main.

Autumn 2018 Consultation

In autumn 2018 the Applicant undertook a consultation exercise on the proposals. Since the conclusion of this consultation period the design of the Proposed Development has been refined as part of the iterative design process resulting in a number of changes. These are summarised below:

- Access to the Site will be from the south and west instead of from the north to reduce the impact on local highways and all permanent impacts on Parsonage Common;

- Construction of a new, permanent causeway into the River Thames for very large and indivisible loads during construction, alongside a haul route from the causeway to the construction site (there are two alternative options for consideration);

- Primary construction access will be from the west to the north of the recently constructed Tilbury 2 site and connect to the main project site via the A1089. Minor works to widen this part of the route will be required;

- Removal of previously proposed access routes for large and indivisible loads;

- Removal of the use of and existing public highways to the north of the project site;

- Reduction in the area required for connection into the National Grid substation due to progress in agreement of the point of connection;

- Substantial reduction in the total area for the gas pipeline route in the vicinity of Station Road through refinement of the gas pipeline route;

- Inclusion of additional land to the south of Station Road outside the perimeter of the Low Street Pit Local Wildlife Site (LWS) to reduce the need for construction work in this area and duration of closures required for construction and maintenance;

- The area for wildlife habitat compensation and enhancement between the railway and Cooper Shaw Road has been amended to separate this land from the exchange Common Land area to improve habitat creation without conflicting the grazing use of Common Land;

- Inclusion of additional land to the west of the project site for carbon capture readiness;

- A new area between Common Land and Fort Road has been included to provide a footpath link between these areas; and

- Temporary diversion of a public right of way to allow the addition of a new area to the west of Station Road, south of Buckland to ensure that the right of way can be created as part of the DCO if required.

c. Autumn 2019 Consultation

Safeguarding and Exclusion Zone

Due to the nature of the development proposals the Applicant requires flexibility in the DCO for the design of a number of elements of the Proposed Development, including the gas pipeline route and siting of the AGI connection to the National Transmission System (NTS). As such, a 'design envelope' has been identified and assessment parameters are set out in each of the technical chapters of the Preliminary Environmental Information Report (PEIR) to ensure that the maximum parameters of the Proposed Development (i.e. worst-case) impacts are assessed.

Although the PEIR refers to physical parameters being considered alongside other parameters such as duration and timing of activities, methods to be employed etc.[1] the plans do not clearly show these parameters, for example, although it is clear that the red line boundary reflects the order limit it is not clear whether land is to be permanently acquired through a Compulsory Purchase Order (CPO), whether the Applicant is seeking the acquisition of the permanent rights to the land for maintenance and access or whether the land is required for temporary construction works only.

Furthermore, guidance from the National Grid[2] states that easement strips for high pressure gas pipelines typically range from 6 to 25 metres in width dependent on the diameter and pressure of the pipeline which do not appear to be shown on any of the plans issued to date. The width of such an easement could have a significant impact on the developable area of the remainder of Cogent's land interests. This information should be provided.

Site Accessibility

The current route of the gas pipeline bisects parcel 14 of Cogent's land interest as set out in **Enclosure 1**, resulting in an area of land to the south of Station Road becoming separated from the wider development site. As mentioned above, the land in question comprises part of a wider masterplan which is being promoted to deliver a minimum of 3,000 homes and associated infrastructure and therefore this reduction in the developable area could have a significant impact on housing delivery.

There is limited guidance from National Grid regarding the construction of new roads over gas pipelines, however, any work to be undertaken within the vicinity of a gas pipeline must receive formal

[1] Paragraph 2.13.2 of Volume 2, Chapter 2: Project Description of the PEIR

[2] http://www.harrowncf.org/SCPMP_Appendix_8_Gas.pdf

written consent from National Grid prior to the commencement of works. Where works are required within the easement of a gas pipeline (as yet undetermined for the Proposed Development) an easement crossing agreement with National Grid must also be completed prior to the start of any works. This could place restriction on the future development of Cogent's land.

There are also further restrictions on the types of plant and equipment which can be used for works in proximity to the pipeline and their location to ensure the integrity of the pipeline is maintained which could complicate the construction process for dwellings and infrastructure. For example:

- Where a new service is to cross the pipeline a clearance distance of 0.6 metres between the crown of the pipeline and the underside of the service should be maintained, otherwise this should cross under the pipeline; and

- Where existing roads cannot be used construction traffic should only cross the pipeline at previously agreed locations.

Consequently, there is potential for the Proposed Development to create access issues to this land parcel during both the construction and operational phases of any future development, which could significantly inhibit the viability of development at this location.

Assessment of Alternatives

Under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations) an Applicant must include "*a description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects*".

The alternatives considered by the Applicant to date are set out in Chapter 3: Alternatives of the PEIR, however this has not been updated since the 2018 consultation.

This chapter provides a very high-level review of the alternative grid connection and site development options considered by the Applicant, with limited justification as to how the preferred option has been reached. It is implied that detailed consultation with National Grid regarding different substation options, but details of such consultation are not provided within any of the available documentation.

Consequently, there is no evidence to suggest that the location of the Proposed Development has been selected based on an assessment of reasonable alternatives on a robust, consistent and objective basis. A genuine assessment process should be undertaken for each of the alternative options, including different route options and not merely further analysis to post rationalise a predetermined outcome in order to comply with the EIA Regulations.

Adequacy and Access to Information

The PEIR comprises six volumes of environmental information which was published as part of the October 2018 consultation. The environmental information made available as part of this consultation is not sufficiently detailed to enable a proper analysis of the proposals.

In addition, no further information has been made available in almost twelve months even though it is our understanding that further technical information has been on-going in the intervening period as a result of the design changes.

Cumulative Effects

Volume 5, Appendix 4.1 of the PEIR sets out a list of development schemes to be considered within the cumulative effects assessment. Whilst the above application (ref. 16/01232/OUT) is listed in this

appendix, there is no reference to the wider masterplan despite this being promoted as part of the Thurrock Local Plan process.

Environmental Issues

There are a number of environmental considerations within the surrounding area to be taken into account within the design and which are considered within the PEIR. The key considerations are discussed further below.

Ecology

There are numerous ecological designations within the surrounding area, both statutory and non-statutory, which require an assessment of impacts during both the construction and operation of the Proposed Development.

The Site is located in the vicinity of the Thames Estuary and Marshes Special Protection Area (SPA) and Ramsar site, and as such a Habitats Regulations Assessment (HRA) has been undertaken to assess the potential impacts of the Proposed Development on the integrity of this European designated site. An Appropriate Assessment (AA) (Stage 3 of the process) has been undertaken with regard to water quality and hydrological changes and concluded that, with appropriate mitigation, no significant adverse effects on this designated site are anticipated. This assessment should be updated as the detailed design of the Proposed Development progresses to ensure the integrity of the Thames Estuary and Marshes SPA and Ramsar site is protected.

Although it is implied that the above planning application (ref. 16/01232/OUT) has been considered within the in-combination assessment (although it is not clearly stated so it is difficult to verify), there is no reference to the consideration of the wider masterplan. Given that this site is being promoted for large-scale residential development as part of the Thurrock Local Plan development process, it would be prudent for this to be considered within this assessment.

Heritage and Views

There are numerous designated heritage assets within the surrounding area. As the design of the Proposed Development is in its early stages it is difficult to make properly informed judgements as to the scale and nature of the impacts likely to result from the Proposed Development. However, the following outlines the heritage assets within the boundary area which is likely to require impact assessment.

Scheduled Ancient Monuments

- Tilbury Fort
- Earthworks near Church, West Tilbury
- Second World War anti-aircraft battery at Bowaters Farm

Listed Buildings

- Officers Barracks, Tilbury Fort – Grade-II*
- Church of St James – Grade-II*
- World’s End Inn – Grade-II
- West Tilbury Hall – Grade-II

- Barn to north of West Tilbury Hall – Grade-II
- Walnut Tree Cottage – Grade-II
- Polwicks – Grade-II
- Buckland – Grade-II

Conservation Areas

- West Tilbury Conservation Area
- East Tilbury Conservation Area

Owing to the statutory duties carried by these designated heritage assets, both Section 66 (1) and Section 72 (1) of the Planning (Listed Buildings and Conservation Areas Act) 1990, National and Local Planning Policies and EIA Guidance, any direct or indirect effect of the Proposed Development is required. This includes both construction and operational effects and pertinent in this case, cumulative effects.

Thurrock Council have not produced specific guidance on strategic or local protected views, but in order to assess the overall impact of the Proposed Development, particularly on the setting of the identified heritage assets, a Visual Impact Assessment is recommended. This assessment would also provide vital evidence to read the potential effects on the natural and built landscape and follow best guidance set out by GLVIA.

Nuisances

The construction and operation of the Proposed Development has the potential to cause noise and vibration, air quality and odour impacts on nearby receptors. The settlement of East Tilbury is located approximately 800m to the north-east of the Site which comprises residential dwellings alongside other community facilities, including schools.

As stated above, Cogent's land interests are being promoted for residential development as part of the Thurrock Local Plan process for an urban extension. These land interests are also located in proximity to the Proposed Development and therefore nuisance impacts on these future receptors should also be considered. If significant impacts are identified and mitigation is not considered to be sufficient, it would seriously compromise the deliverability of a residential development on this land, with potential wider implications for housing delivery across the borough. There is no evidence in the documentation to date to suggest that future residential receptors at the Cogent site have been or will be considered within the assessment.

The PEIR outlines the anticipated assessment of noise and vibration and air quality impacts but makes no reference to the assessment of odour impacts on existing or future receptors. Due to the nature of the proposals there is potential for both direct and indirect impacts in relation to odour to occur during both the construction and operational phases of the Proposed Development which should be assessed in accordance with recent case law[3]. The EIA Scoping Request was submitted to PINS in August 2018, prior to the High Court judgement in relation to odour assessments, however the scope of the EIA should be revised to include this topic in accordance with recent case law and the EIA Regulations.

[3] https://www.bailii.org/cgi-bin/format.cgi?doc=/ew/cases/EWCA/Civ/2019/888.html&query=(C1/2018/2122)

d. Summary

Cogent do not object to the principle of the DCO scheme, however, we believe that the further work needs to be undertaken to fully assess the impacts of this development on the surrounding area, including Cogent's land interests.

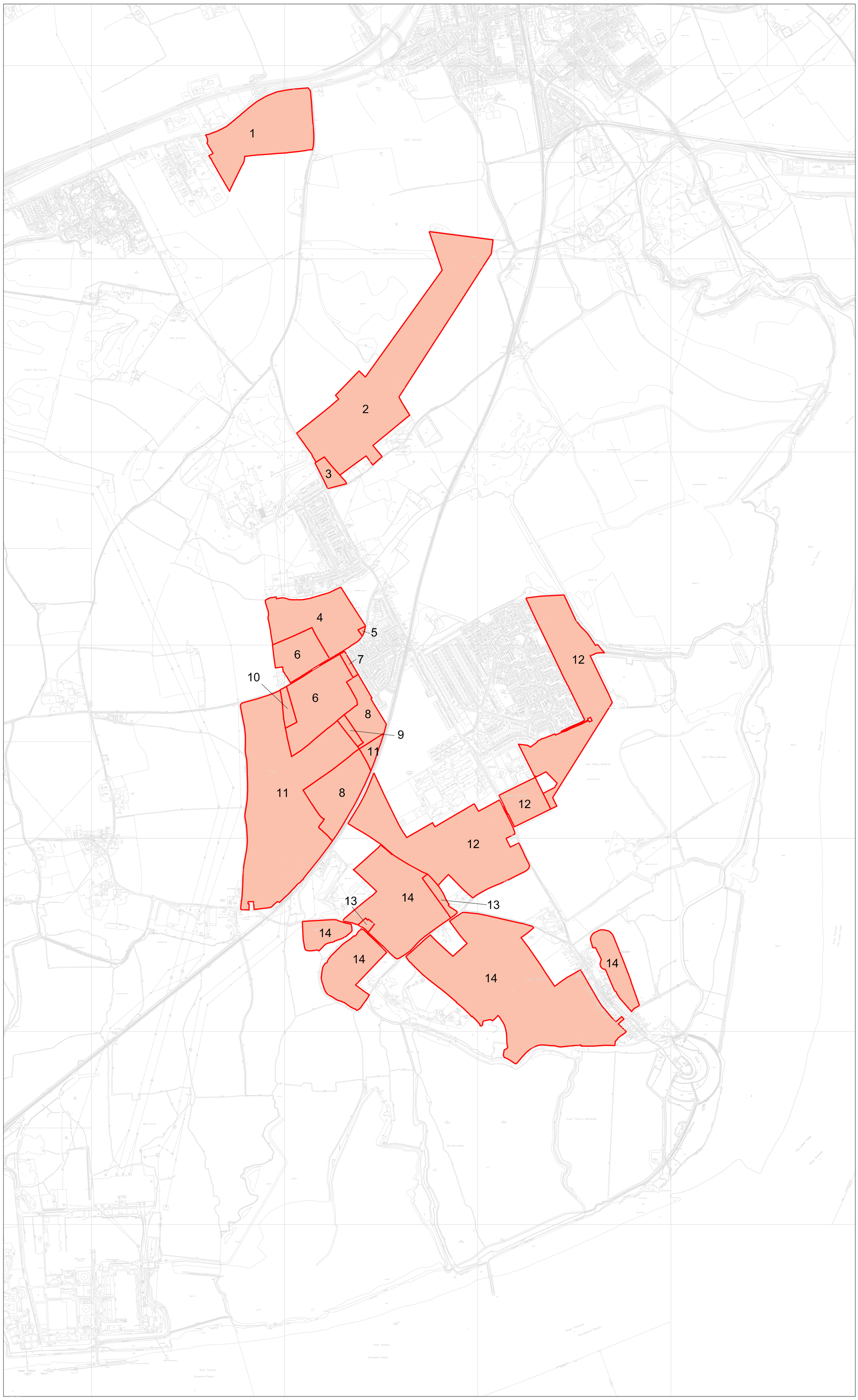
We would be grateful for confirmation that these representations have been received and have been accepted into the examination. Should you have any queries or require any additional details regarding any of the information raised above then please do not hesitate to contact me on esmeaton@iceniprojects.com/ 07557 805 372.

Yours faithfully,

Eilish Smeaton
Director, EIA and Planning

cc. Cogent Land LLP

Enc. 1. Map of Cogent's land
2. Local Plan Representations



Parcel	Title Ref / part thereof
1	EX744156
2	EX316725
3	EX732360
4	EX729541
5	EX569762
6	EX729542
7	EX731619
8	EX731621
9	EX192190
10	EX731622
11	EX102230
12	EX714102
13	EX763684
	EX695319
14	EX246889

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Project
East Tilbury

Job Ref. 18-M015
Drawn nm

Drawing Title
East Tilbury Ownerships

Scale 1:10,000 @A1
Date 13.12.18

Drawing no. 001
Rev. B: 20.12.18

Land Promotion Summary

Cogent have been promoting land at East Tilbury for development throughout the Local Plan making process for a number of years, as detailed below.

The subject land was first submitted to the **Local Plan Call for Sites consultation in January 2015**.

Cogent submitted representations to the **Draft Thurrock Local Plan Issues and Options (Stage 1)** consultation in April 2016 promoting land for a Sustainable Urban Extension incorporating a mix of uses including housing, road infrastructure, educational / community / health facilities, and employment uses for land referred to as Land to the West of East Tilbury. A planning application relating to this hand was subsequently submitted in September 2016 (considered below).

Further representations were submitted to the **Call for Sites consultation in April 2018**. These representations related to the following sites:

- Land to the West of East Tilbury – land relating to planning application Ref: 16/01232/OUT (73.69ha);
- Land to the West of Tilbury Village and East Tilbury (72.5ha);
- Land to the east and south of Coronation Avenue, East Tilbury (19.69ha);
- Land to the east of Princess Margaret Road, East Tilbury (63.63ha);
- Land to the north-east of Gobions Park, East Tilbury (28.6ha);
- Land to the north and east of Walton Hall Road, Linford (17.7ha);
- Land to the east of Buckingham Hill Road, Linford (1.26ha); and
- Land to the south of Stanford Road, Linford (14.9ha).

Since the public consultation on the Lower Thames Crossing in late 2018, Thurrock Council ran the **Local Plan Issues and Options (Stage 2)** consultation between December 2018 and March 2019. The purpose of the consultation was to seek views about how Thurrock should develop and grow in the future and where, in broad terms, new development should be located to meet identified needs.

'Figure 2: Call for Sites Map' of the Draft Thurrock Local Plan Issues and Options (Stage 2) showed that almost all the land affected by the Lower Thames Crossing preferred route in and around East Tilbury have been put forward for consideration for future residential and/or employment uses. This includes the land which is the subject of these representations.

Cogent submitted representations relating to the subject land and identified the potential contribution the sites could make towards development needs in Thurrock, which is significant in the context of growing need for housing and employment provision in the Borough and the Council's ambitious growth strategy.

Land at **East Tilbury**

REPRESENTATIONS TO THURROCK LOCAL PLAN ISSUES AND OPTIONS (STAGE 2) CONSULTATION

COGENT LAND LLP

MARCH 2019

Contents

1 | Introduction

Iceni Projects Ltd have been instructed by Cogent Land LLP ("Cogent") to submit representations to Thurrock Borough Council's ("the Council") Local Plan Issues & Options (Stage 2) consultation. Cogent have an interest in land at East Tilbury and is currently working with landowners and local stakeholders to bring forward a sustainable urban extension, incorporating a mix of uses including housing, road infrastructure, educational, community and health facilities as well as employment uses. Further land in their portfolio is available to deliver wider growth in this location.

Cogent specialises in sustainable development and strategic land. It has secured development plan allocations and planning permissions for major development sites across the UK. Cogent has an established and extensive presence in the Thames Gateway area, with a strong and committed focus in Thurrock.

These representations should be considered alongside those previously submitted, which most recently include the following:

- Thurrock Council – Local Plan Call for Sites – January 2015
- Thurrock Council – Local Plan Issues and Options (Stage 1) – February 2016
- Thurrock Council – Local Plan Call for Sites – April 2018

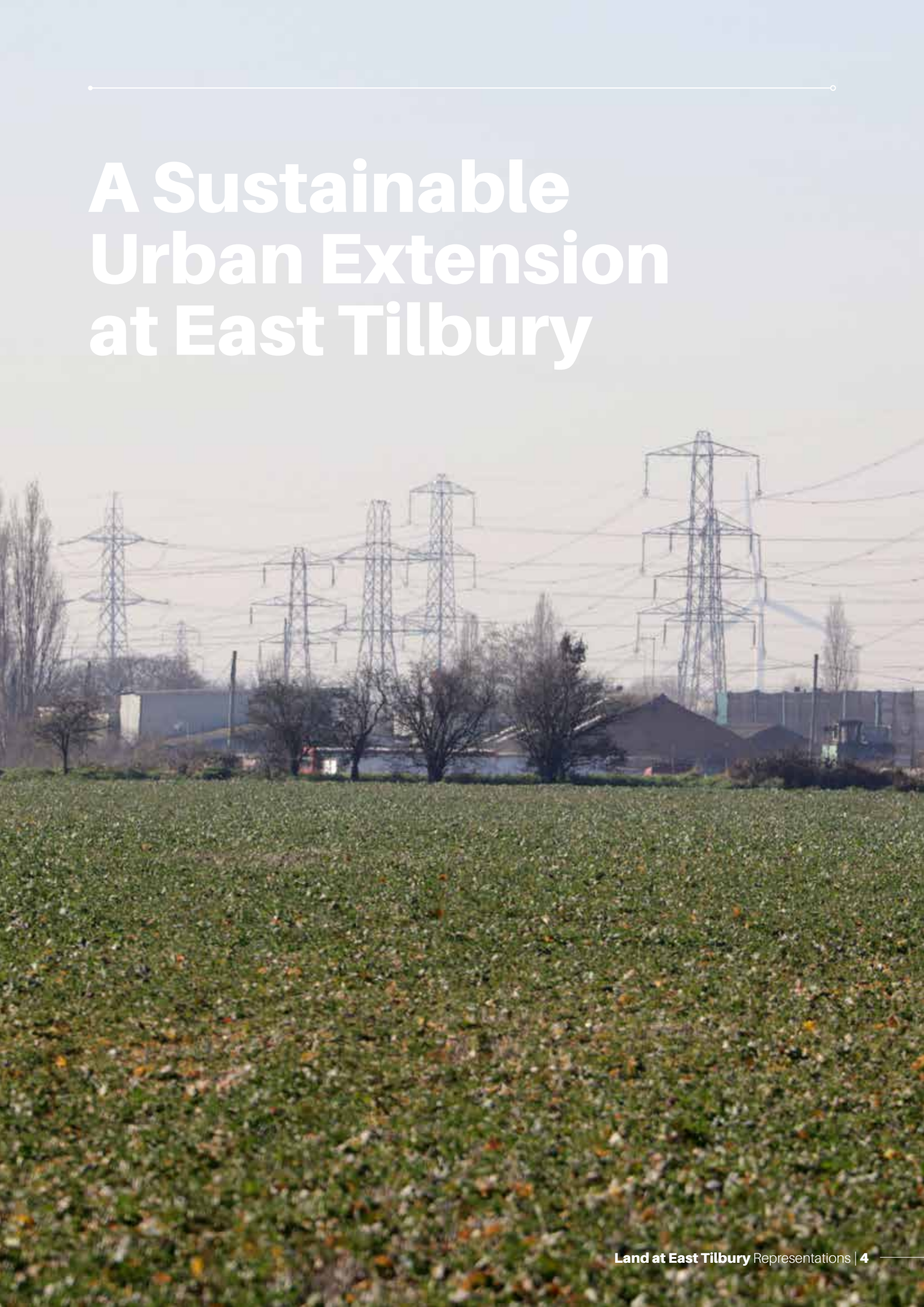
These representations are structured as follows:

- Section 2 - provides an overview of the strategic context of East Tilbury;
- Section 3 – reviews the planning policy framework that is shaping future growth in Thurrock Borough;
- Section 4 – gives consideration of factors impacting housing growth;
- Section 5 - considers appropriate locations and a preferred strategy for growth;
- Section 6 - the potential of East Tilbury as a sustainable location for a major urban extension is highlighted and the possible contribution of the sites Cogent is promoting is identified;
- Section 7 – provides an overview and summary with the response to the key consultation questions.

The following supporting evidence is provided as appendices to this document:

- Appendix 1 – Site Location Plan
- Appendix 2 - Thurrock Issues and Options: Reviewing the Housing & Economic Evidence
- Appendix 3 – Review of the Integrated Sustainability Appraisal

A Sustainable Urban Extension at East Tilbury



2 | Context

This Section provides an overview of the strategic context within which the Thurrock Local Plan is being prepared and identifies the extent of Cogent's land interests in East Tilbury.

THURROCK BOROUGH - STRATEGIC CONTEXT

Thurrock benefits from a key strategic location, situated approximately 20 miles east of Central London, in South Essex. The Borough has over 18 miles of riverfront along the northern bank of the River Thames which makes it a prime location for port related activities. The M25 and A13 provide strategic road connections and there are regular rail services between London and Southend-on-Sea.

Thurrock falls within The Thames Estuary Growth Area which has an important brand and status and makes a significant contribution to the UK economy and UK plc. The Thames Estuary has been a key Government growth priority and is an area with great potential. Over the past few decades it has consistently been unable to deliver the same level of economic growth as other parts of the UK. There are great disparities in wealth and opportunity. This can be attributed in part to poor accessibility and connectivity within and between the area. These constraints must be addressed to help the Thames Estuary realise its full potential. This is recognised by the Thames Estuary 2050 Growth Commission who's Vision to deliver **1.3 million new jobs, £190 billion additional Gross Value Added (GVA) and 1 million new homes** is underpinned by connected places.

The underperformance of the wider Thames Estuary should be considered in the context that Thurrock is a borough that is undergoing transformational change and has a proven track record of attracting inward investment.

This is principally being driven by economic growth at five Key Strategic Economic Hubs comprising of: Purfleet; Lakeside / West Thurrock; Grays Town Centre; Tilbury, and London Gateway. Indeed, employment growth in Thurrock has exceeded both the national average which is testament to the opportunities afforded in the Borough, its proximity to the Capital and wider strategic transport network. Notable inward investment successes during the current LDF plan-period include:

- the opening of the Royal Opera House Production Park;
- diversification within the Lakeside Bain;
- the new Amazon Fulfilment Centre at Tilbury;
- the Port of Tilbury expansion land, and
- the ongoing occupation of DP World Logistics Park.

Current and / or planned upgrades to infrastructure is affecting the strategic makeup of the Borough, with more companies wanting to expand or relocate to Thurrock. Catalysts for growth include the upgrading of the A13 dual carriageway; expansion of Southend Airport; ongoing transport upgrades at Ebbsfleet; improvements to the A127, and the proposed Lower Thames Crossing.

Infrastructure and housing are vital ingredients for continued economic growth in Thurrock.

EAST TILBURY

East Tilbury is a settlement located to the south of the A13. East Tilbury originated as a purpose-built industrial settlement created by the Bata Shoe Company in the 1930s. The East Tilbury Conservation Area was designated in 1993, and consists of the former factory complex of the Bata Shoe Company and a large housing development in a 'garden village' setting. The population of East Tilbury is 6,724[1].

East Tilbury is well served by a range of services and facilities. The settlement has a railway station; primary school; several doctors' surgeries; convenience shopping; a local library and large amounts of open space.

East Tilbury is surrounded by low-lying land, which is currently designated as Green Belt. To the east of the settlement is several large-scale waste sites, e.g. Mucking Marshes landfill and East Tilbury Landfill Quarry.

COGENT'S LAND INTERESTS

The land subject of these representations includes:

- Land to the West of East Tilbury/ Land at Muckingford Road - land relating to planning application 16/01232/OUT (73.69ha)
- Land to the West of Tilbury Village and East Tilbury (72.5ha)
- Land to the east and south of Coronation Avenue, East Tilbury (19.69ha)
- Land to the north and east of Walton Hall Road (17.7ha)
- Land to the east of Buckingham Hill Road (1.26ha)

Combined, these sites comprise almost 185ha and have the potential to deliver at least 3,000 dwellings and associated infrastructure.

[1] ONS, Mid-year Population Estimates 2017

PLAN DETAILING KEY DEVELOPMENT SITES WITHIN EAST TILBURY

The red line boundaries of these sites are provided at **Appendix 1**.

2 | Context

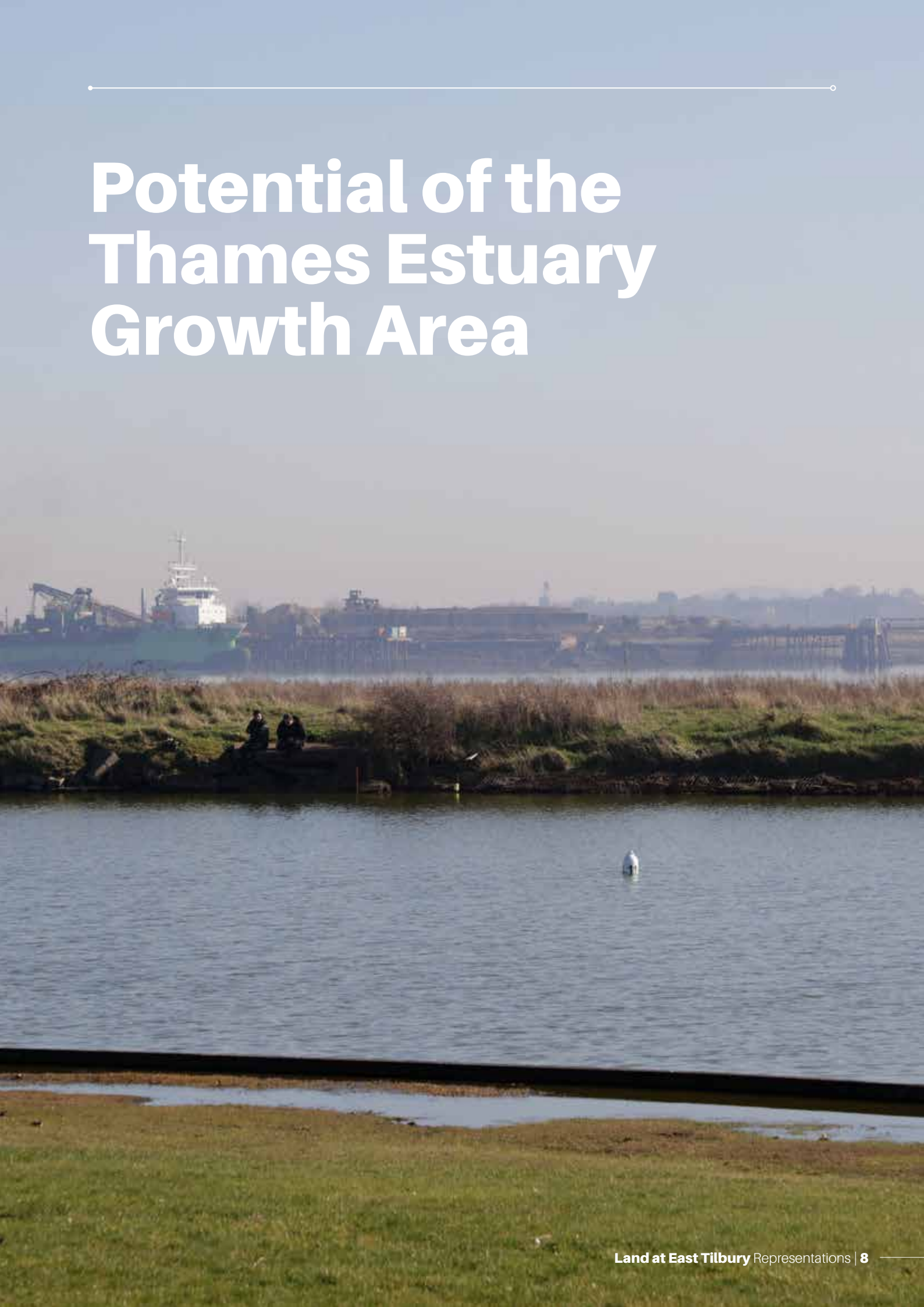
PLANNING HISTORY

Cogent submitted an outline planning application for 1,000 dwellings, a new local road network including a vehicular and pedestrian railway crossing, a one form entry primary school, local centre and open space in September 2016 on land at Muckingford Road (16/01232/OUT). The site, which is located to the west of East Tilbury is adjacent to the settlement boundary.

There have been several residential-led planning applications at East Tilbury in recent years as summarised in the Table below. Bata Fields was approved following a call-in by the Secretary of State which provides pertinent precedent for development and Green Belt release in this location.

Application No.	Address	Description	Status
16/01232/OUT	Land at Muckingford Road	1,000 dwellings, a new vehicular / pedestrian railway crossing, a new primary school, a local centre, open space, including formal recreation.	Awaiting decision
09/50045/TTGOUT 14/00646/REM	Bata Field, land adjacent to Bata Avenue, East Tilbury, Essex	Residential development of up to 299 dwellings	Appeal allowed 21.06.2010 Reserved Matters approved 09.01.2015
13/01163/FUL	Land at Thames Industrial Estate, Princess Margaret Road, East Tilbury	Residential development of 50 dwellings	Approved 11.12.2014
15/01225/OUT	Land to Rear Of 4 - 20 Bata Avenue East Tilbury	Provision of up to 14 dwelling and improved vehicular access to The Rigg Milner Medical Centre	Approved 22.10.2015

Potential of the Thames Estuary Growth Area



3 | Policy Context

This Section reviews the planning policy framework that is guiding future growth in Thurrock Borough.

NATIONAL PLANNING POLICY FRAMEWORK

The National Planning Policy Framework (NPPF) 2019 states that the planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.

Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for housing, infrastructure, community facilities and conservation and enhancement of the natural, built and historic environment. These policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area.

The Framework restates that planning authorities are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries. Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans.

Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere. In order to demonstrate effective and on-going joint working, strategic policymaking authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these.

To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

Paragraph 72 acknowledges that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way.

The Government attaches great importance to Green Belts however, there is provision for boundaries to be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. The required process is for strategic policies to establish the need for any changes to Green Belt boundaries and subsequently detailed amendments to those boundaries may be made through non-strategic policies.

Paragraph 137 of the Framework requires that before concluding exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This includes maximising potential of brownfield land, optimising density within urban areas and discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.

JOINT STRATEGIC PLAN

Thurrock also forms part of the Association of South Essex Local Authorities (ASELA) which has committed to bringing forward a Joint Strategic Plan (JSP) to cover a 20-year period to 2038. The first round of consultation on the JSP is planned for spring 2019. The JSP will set out a wider vision and spatial strategy for the development of South Essex including a range of high-level strategic policies which will establish the scale and distribution priorities for new development and infrastructure delivery.

3 | Policy Context

The JSP will identify a range of broad strategic locations and priorities for new development and infrastructure delivery, it will not allocate specific sites for development which will continue to be determined locally through the Local Plan process.

The current estimated need for housing across South Essex is 90,000 dwellings over the next 20 years but with the right conditions to support growth, more could be achieved.

THE NEED FOR A NEW THURROCK LOCAL PLAN

The Council does have an adopted Local Development Framework (LDF). The LDF was originally adopted in 2011 and was then updated in 2015 following a focused review of the document to ensure consistency with the NPPF. However, there is an urgent need for a new Local Plan to respond to a number of challenges facing the Borough and to address a number of shortcomings with the existing LDF. For instance, the current plan does not provide a sufficient framework for delivering Thurrock's ambitious growth strategy. The plan also relies on the revoked East of England Plan's future development need targets which is inconsistent with the national policy requirements. The Council has been consistently underdelivering in terms of housing and the Council can currently only demonstrate 1.2 years of housing supply compared with the 5-year requirement meaning that housing needs are not being sufficiently met.

It is acknowledged that the proposed Lower Thames Crossing results in uncertainty and could have implications for the new Local Plan. However, in order for the Council to be able to leverage Highways England's and Government's decision making with regard to the final route and proposal, it would be advantageous to have a plan in place. The Local Plan should also seek to maximise the opportunities arising from the delivery of the Lower Thames Cross to ensure that the potential economic benefits are fully captured.

All of these factors indicate that there is a pressing need for Thurrock Council to progress with the preparation of the new Local Plan without delay to ensure that the planning system is genuinely plan-led.

33,800 jobs predicted in the Plan Period

4 | Factors Impacting Future Housing Growth

This Section considers what level of growth is needed over the plan period in terms of housing. These representations are supported by a technical Review of the Housing and Economic Evidence which is provided at **Appendix 2**.

Standard Method Baseline

The 2019 NPPF is clear that plans should provide a strategy which, as a minimum, seeks to meet the area's objectively assessed housing needs; and is based on effective joint working which addresses unmet need from neighbouring areas where this is consistent with achieving sustainable development and other policies in the Framework.

The Planning Practice Guidance (PPG) is clear that the assessment of housing need is an unconstrained assessment which is the first step in the process of deciding how many homes need to be planned for (Para 2a-001) and should be undertaken separately from consideration of land availability and development constraints.

The PPG sets out that the standard method should be used to calculate the minimum annual local housing need. This is an important "starting point", but the Guidance is clear that there may be circumstances in which it is appropriate and justified to plan for a higher housing need figure. For example, where there are funding strategies in place to promote and facilitate growth, strategic infrastructure improvements are envisaged that are likely to drive an increase in the homes needed locally or an authority agrees to take on unmet need from neighbouring authorities.

Based on the Government's standardised housing method Thurrock's Local Housing Need, is **1,169 dpa**, which is slightly below the 1,173 dpa figure in the Issues and Options (Stage 2) Consultation Document as the household projection data for the 2019-29 decade has been used rather than 2018-28, which has a modest, but essentially inconsequential impact.

At the ASELA level, the standard method thus points to a minimum housing need for 87,100 homes (2018-38); and an uncapped housing need for 91,700 homes (2018-38). For Thurrock, the standard method points to a need for **22,210 homes over the Local Plan period 2018-37**.

Housing Target Uplift

Iceni welcomes the positive recognition within the Issues and Options (Stage 2) Consultation Document that there is a need to explore that a higher level of housing need, above the standard method, may be necessary to **support the borough's economy and Council's economic growth ambitions**. It is agreed that it is appropriate, and indeed necessary, to look at this issue to ensure any imbalance between jobs and homes is addressed; to ensure economic investment is not hindered and does not result in unsustainable commuting patterns.

Iceni consider that it would be appropriate for the Council to test its potential to **contribute to an unmet need arising from London** through the plan-making process, given the strong migration and commuting interactions between the Borough and London. It should liaise through the Duty to Cooperate with boroughs in East London on this basis.

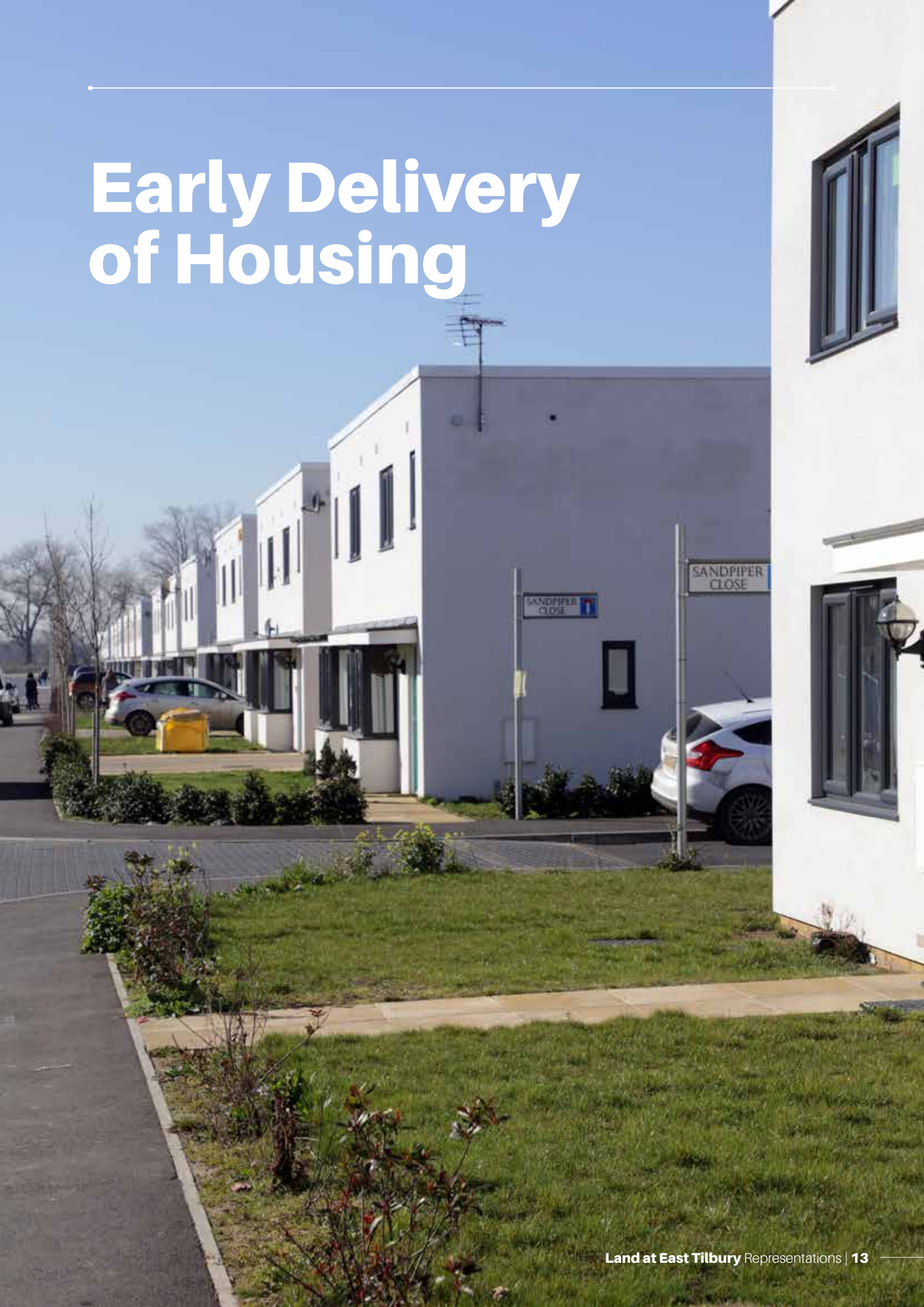
A review of the Council's housing and employment evidence base has been undertaken and an alternative economic growth scenario has been prepared, taking account of the following drivers: port expansion, growth in B8 logistics development, manufacturing and distribution development displaced from London, Lakeside expansion and construction activities. Bringing the evidence together, this analysis points to an expected economic growth of 33,800 jobs in Thurrock over the 2018-38 period.

Our analysis shows that this would result in:

- A need for at least 33,500 homes over the plan period (2018-38);
- A need for at least 584 ha of B-class employment land.

The Integrated Sustainability Appraisal (ISA) of the Thurrock Local Plan: Issues and Options (Stage 2) (2018) concludes that delivering an objectively assessed need of 1,173 dpa or a higher housing target would have similar environmental effects as both alternatively will lead to development of a significant number of new homes in the Borough. The greater the number of homes to be delivered, the greater the likely magnitude of the effects. There are high levels of uncertainty as to the actual effects of each option, as many effects will depend on the exact location of new development. Such effects will need to be considered through development of development management policies.

Early Delivery of Housing



5 | Strategy for Housing Growth

This Section considers the spatial options for housing growth presented within the Thurrock Local Plan Issues and Options (Stage 2) Consultation Document.

MAJOR URBAN EXTENSIONS

Based on the evidence in the Housing Land Availability Assessment (HLAA), focusing development in the Thurrock urban area will only deliver less than 6,500 new homes meaning that the Council must consider other spatial options for accommodating growth.

The Issues and Options (Stage 2) Consultation Document identifies seven key locations which have potential to accommodate at least 1,500 homes as sustainable urban extensions. Table 5.9 of the ISA indicates a scale of growth of 3,000-5,000 homes at East Tilbury.

The ISA assessed the housing growth options against the key sustainability objectives. Aside from Urban Intensification, the other spatial options put forward in the Issues and Options document are all assessed as having primarily negative effects against the environmental objectives and more positive effects with regards to economic and social objectives.

It is noted that although the amount of development associated with each of these options varies substantially, they are all of a scale at which some negative environmental impacts are likely to be inevitable, but they will provide at least some new services and facilities. It is contended that major urban extensions (1,500 dwellings +) provide the critical mass to warrant the delivery of additional services and facilities that may not be viable to provide as part of a small quantum of development associated with smaller urban extensions, village expansion or isolated site allocations.

The ISA notes that there is a high degree of uncertainty associated with most effects, as the assessment was based on broad potential locations for development, so effects will depend on the actual locations where development comes forward.

Appendix 3 includes a critique of the ISA which identifies that the following amendments to the ISA impacts are proposed in relation to East Tilbury:

- **Biodiversity (significant negative (uncertain)):** East Tilbury is located within the Impact Risk Zone (IRZ) for a number of SSSIs as well as the IRZ for internationally designated sites such as the Thames Estuary and Marshes Special Protection Area (SPA) and Ramsar site. There is insufficient information at this stage to determine the exact nature of the impacts on these sites which could arise as a result of major urban expansion at East Tilbury, and a separate Habitats Regulations Assessment (HRA) will be undertaken to consider the potential for significant effects in this location.
- **Historic Environment (minor negative (uncertain)):** there are numerous designated heritage assets located around East Tillbury, and it is recognised that any major urban expansion in this area has the potential to result in negative effects on the setting of these assets. However, impacts on designated heritage assets will depend on the exact location and scale of development, which is currently unknown, and it is likely that any negative impacts could be mitigated by design
- **Landscape, Townscape and Visual (significant negative (uncertain)):** East Tilbury is located within Landscape Character Areas (LCAs) considered to be of high sensitivity to large-scale housing development which could therefore result in negative effects. However, any impacts on landscape character are dependent on the location, scale and nature of the development, which is unknown at this stage and likely to be mitigated by design.
- **Noise (minor negative (uncertain)):** any impacts in relation to noise are dependent on the location, scale and nature of the development which are currently unknown. Although development in this area could result in sensitive noise receptors (e.g. housing) located closer to noise sources, mitigation measures to address any negative impacts are likely to be embedded into the design.

A housing growth strategy that is centred on delivering a number major urban extensions across the Borough is promoted by Cogent. Notwithstanding, it is expected that **in reality a combination of the options will be required to meet the scale of development required.** This is considered in further detail below.

HOUSING LAND SUPPLY AND THE HOUSING TRAJECTORY

It is essential that the housing strategy in the new Local Plan is capable of delivering housing consistently throughout the plan period, recognising the necessary lead-in times for a range of development options as set out in the Issues & Options (Stage 2) Consultation Document.

[2] In accordance with the Housing Delivery Test Rulebook (July 2018), where a Local Plan is more than five years old, the local housing need figure will be replaced by the Household Projections (2012-based Household Projections for 2015/16, 2016/17 and 2014-based Household Projections for 2017/18). The standard methodology will apply as the requirement for future years.

5 | Strategy for Housing Growth

The Consultation Document sets out an indicative housing trajectory drawing on the Thurrock HLAA, dated October 2017. This includes a total supply in years 1 to 5 (2017-22) of 2,635 dwellings.

Five Year Housing Land Supply

In the short-term, in advance of the adoption of a new plan, the Council will need to assess five-year land supply against the area's local housing need. As set out in the Issues and Options (Stage 2) Consultation Document, the land supply situation is less than two years, placing the Council at risk of Government intervention or sanction through the Housing Delivery Test. We understand that the Council's latest assessment is that it has a 1.2 years land supply.

The *very low* land supply position already engages the presumption in favour of sustainable development. The presumption can however, also be engaged by the Housing Delivery Test. Current performance, at 88%[2], is marginally above the threshold (of 85%) at which a 20% buffer is required to be added in the five-year land supply calculation.

It should be noted that from November 2019 onwards, the housing requirement for assessing Housing Delivery Test performance will increase. The requirement for years from 2018 onward will be set against will be the local housing need drawn from the standard method; and it will therefore be more challenging to achieve.

It seems highly likely that, based on current performance, the Housing Delivery Test results in November 2020 would fall below 75%, and this would therefore engage the presumption in favour of sustainable development.

Fundamentally there is an urgent need to improve the housing land supply position and increase housing delivery and the Council is required by Government to consider what it can do now to address this, in the short-term, through preparation of a Housing Delivery Action Plan.

In particular, Green Belt is the overarching constrain which is inhibiting the delivery of homes. The Council should carefully consider how within this context it can boost housing delivery in the short-term, and should support and encourage planning applications to come forward in the short-term, in advance of the adoption of the Plan, on selected sites which are adjacent or close to public transport nodes and which would not prejudice the delivery of wider growth. The preparation of a Housing Delivery Action Plan provides a means of considering this.

Future Housing Land Supply

Looking beyond the five-year period, the indicative housing trajectory identifies a total of 2,593 dwellings from years 6 to 10 and 1,250 dwellings from years 11 to 15. The Issues & Options Consultation Document recognises that across years 6 to 15, the majority of housing land supply coming forward is from the Purfleet Centre which is proposed for 2,850 dwellings and will be delivered across years 6 to 10 and years 11 to 15. Beyond Year 10, there are no other developable sites other than the Purfleet Centre that contribute to the indicative trajectory. Total provision is therefore identified for 6,478 dwellings from urban capacity sources in the Borough which is insufficient. The Council must realise the benefits of incorporating a range of sites of different types and sizes, including Green Belt land, in order to drive the step-change in housing delivery that is required.

THE POLICY REQUIREMENTS

In line with the NPPF, the Local Plan will need to demonstrate that a supply of specific deliverable sites for Years 1 to 5 from the point of adoption, together with an appropriate buffer; and a supply of specific developable sites, or broad locations for growth for Years 6-10 and where possible Years 11-15.

The Framework identifies that sites of different sizes can all contribute to maintaining housing land supply. Paragraph 68 recognises the role that small and medium sized sites can play in making an important contribution to meeting the housing requirement in that they can be built out relatively quickly. Paragraph 72 recognises that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. The Framework therefore recognises the benefits of different sources of supply (and sizes of site) can have in contributing to housing delivery.

In order to achieve a robust supply position which can contribute to housing delivery throughout the plan period and ultimately future proof the assessment, it is clear that the Council should look to incorporate:

- Varying sources of housing land supply which can offer different opportunities and drive delivery i.e. urban intensification will support existing urban and town centres and regeneration; small and medium sized greenfield sites; and large new settlements or urban extensions can secure funding and investment in strategic infrastructure and provide a secure source of housing delivery over longer periods;

5 | Strategy for Housing Growth

- Site allocations across different parts of the Borough to respond to the rate at which the market typically absorbs housing products and to ensure that the housing offer caters to varying markets and differing characteristics of buyer profiles across the Borough; and

- A range of sites which can cater for a range of different market segments including those who require affordable housing; development of flats and houses, including family housing; housing for older people; build-to-rent development; and self-build opportunities.

As set out clearly by the Framework (paragraph 68), small and medium-sized sites can play a key delivery role in the short-term as they are often built out relatively quickly; whereas larger sites (paragraph 72) play a key role in maintaining housing delivery rates in the medium- and longer-term.

Large, strategic sites play a key role in delivering strategic transport and social infrastructure, deliver a variety of homes to meet the needs of different groups in the community and can deliver net environmental gains to the wider benefit of the Borough.

Larger, strategic sites also have a number of deliverability benefits whereby fewer landowners are involved, reducing assembly complications; and have the ability to support different products which respond to differing profiles of ages and earnings; as well as the size and types of households.

Fundamentally however, large, strategic sites also present an opportunity to truly drive strong delivery rates and maintain housing delivery throughout fluctuations in the market across the plan period. This is evident when looking at particular local authority areas across England including, for example, in Milton Keyes, Corby and Swindon where an annual growth rate of 1.5% or more has been achieved in comparison to the national average of 0.8%. All of the local authority areas noted have brought forward substantial urban extensions or new settlements which have supported a greater resilience of housing delivery to market fluctuations.

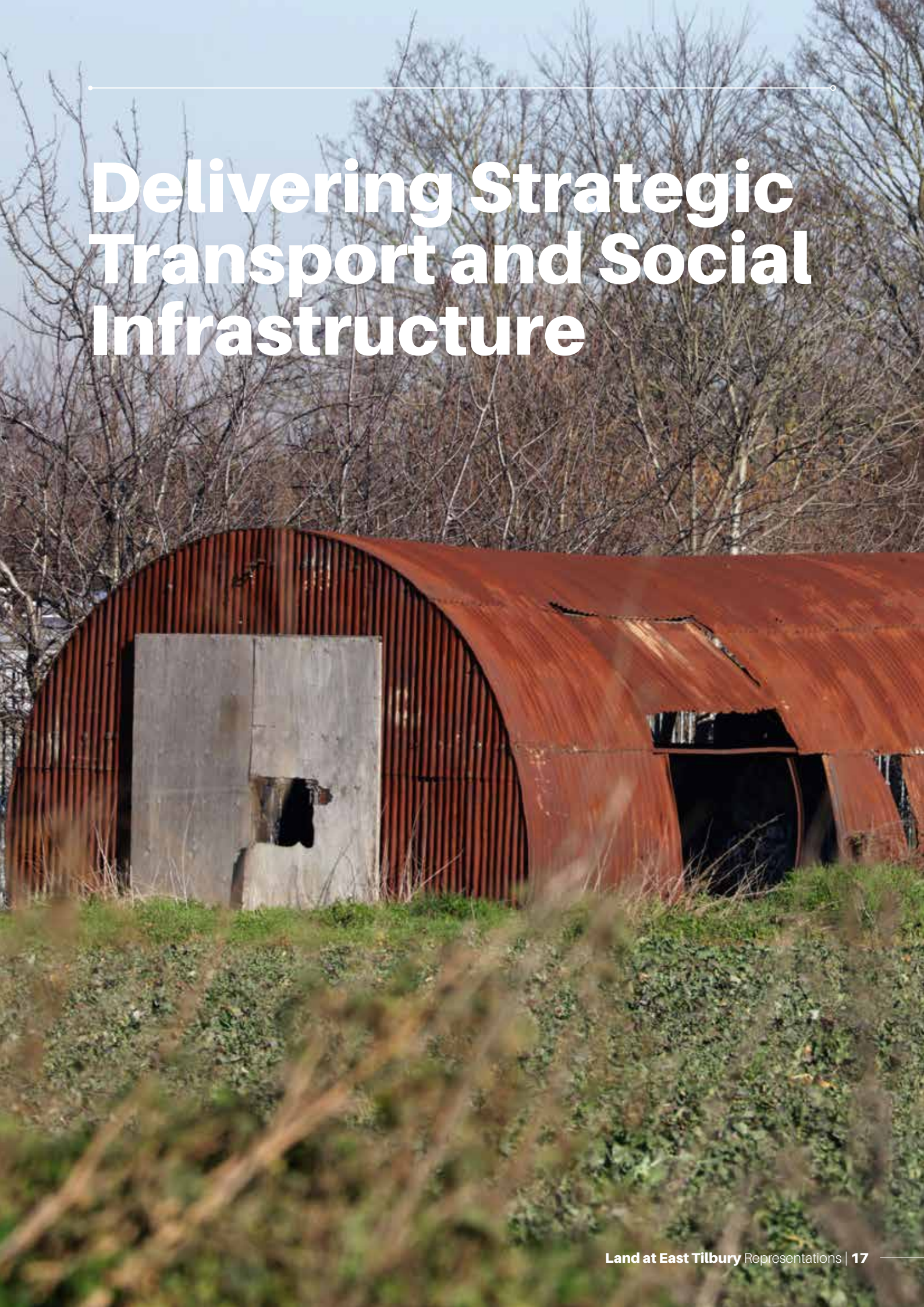
ACCELERATING DELIVERY

It is imperative to the soundness of the Local Plan that early housing delivery is facilitated as soon as possible and not unnecessarily delayed beyond its adoption. For example, any requirement for further guidance on masterplanning of strategic growth areas should be facilitated either through the Local Plan itself or twin-tracked in a separate Supplementary Planning Document. The need for further Development Plan Documents beyond the adoption date of the Local Plan will only further exacerbate the delay in delivery of much needed housing.

Given that large and strategic sites of this scale will be imperative to the delivery of housing in the Borough, it is essential that these lead-in times are not unnecessarily extended with the requirement for adoption of further Development Plan Documents beyond the adoption date of the Local Plan.

Further, in light of the above, full advantage should be taken of opportunities for early delivery of housing land in order to front load the housing trajectory. This is especially important noting the extent of housing which would effectively be delivered through Green Belt release and the fact that much of the delay to adoption of the Local Plan is as a result of uncertainty over the implementation of the Lower Thames Crossing. The Council should therefore take the opportunity to bring forward early delivery of housing, in advance of adoption of the Local Plan, in sustainable locations which would not prejudice future delivery of strategic growth areas.

Delivering Strategic Transport and Social Infrastructure



6 | East Tilbury as a Location for Growth

This Section considers the appropriateness of East Tilbury as a location for accommodating Thurrock's growth requirements and incorporates a review of the evidence base with a particular focus on the Cogent's land interests.

SUSTAINABILITY OF EAST TILBURY

The ISA provides an assessment of the sustainability of each of the seven settlements identified as potential locations for Major Urban Extension including East Tilbury. Due to the scale of Major Urban Extensions and the uncertainty about their exact locations, all options perform in a similar way.

East Tilbury is identified as having a significant negative effect in relation to biodiversity, flora and fauna, historic environment, flood risk, geology and soils, landscape, townscape and visual and noise. These effects are uncertain at this stage, as they depend on the exact location and design of development. It is worth noting that many of the uncertainties identified could be addressed by including design and layout specification in any allocation policies within the Local Plan and subsequently within any development proposals.

Development at East Tilbury could result in positive effects in terms of climate change and energy, economy and employment, education and skills, housing, equalities and access to services and facilities.

IMPACT OF LOWER THAMES CROSSING

Highways England consulted on their preferred route for the Lower Thames Crossing in December 2018 to inform the Development Consent Order application. The proposed route could blight the development potential of East Tilbury, however, we understand that further technical work is being undertaken to refine the proposal. Cogent submitted representations and have been involved in ongoing dialogue with Highways England in this respect.

The preferred route should support and not constrain the ability of Thurrock Council to meet its future development needs by impacting on housing land supply. Realignment of the proposal around East Tilbury, for example, locating the proposed Rest and Service Area and Depot on the western side of the proposed Tilbury Junction would mean that housing could still be supported in East Tilbury within the identified growth area.

The provision for a local connection from the proposed Tilbury Junction to East Tilbury to support sustainable local development and wider regeneration of the settlement, address infrastructure deficits and help to overcome current severance issues associated with the railway crossing. This connection could provide an opportunity to include provision for a new public transport link connecting Ebbsfleet and the existing railway station at East Tilbury which would facilitate a link between Kent and key strategic allocations with East Tilbury and the key employment locations in Thurrock and support regional economic growth.

The proximity of the Lower Thames Crossing route does not compromise the delivery of the proposed development of a new sustainable extension (planning application ref. 16/01232/OUT), however, the land is identified for associated infrastructure including flood compensation, environmental mitigation measures and utilities diversion act to blight the land. These land uses are not location specific per se, and as the technical studies prepared as part of these representations (considered in further detail below) identify, it is not possible at this stage to make properly informed judgements on what level of mitigation/compensation is required, or importantly, whether the proposals are a proportionate response to an identified level of harm.

Confirming the preferred option at East Tilbury would help to influence the final route alignment in this location.

REVIEW OF THE EVIDENCE BASE

Housing Land Availability Assessment

Part of subject land was assessed as part of the Thurrock HLAA 2017. The application site – land west of East Tilbury and the adjacent parcel - falls within site reference EAT_14. The assessment considers that the site is not suitable or developable due to its location in the Green Belt, a small area of designated open space, physical limitations, the agricultural land use and heritage impacts.

The HLAA clearly applies a "policy on" approach to assessment. The Council acknowledges that there is a need for Green Belt release, therefore, it is not beneficial for the assessment to discount sites based on its location within the Green Belt as this does not allow these sites to be differentiated to evidence and justify exceptional circumstances for release. In terms of the physical limitations and potential environmental and amenity impacts,

6 | East Tilbury as a Location for Growth

a masterplanning exercise undertaken as part of the preparation of the planning application (16/01232/OUT) which demonstrates that it is possible to deliver a scheme that fully addresses the constraints and mitigates against any potential adverse impacts.

Furthermore, this planning application was supported by an Environmental Impact Assessment which included an assessment of potential impacts on transport, ecology, archaeology and cultural heritage, landscape and visual impact, arboriculture, noise and vibration, air quality, agricultural land quality, water management, utilities and infrastructure and socio-economics and concluded that there would be no significant residual adverse impacts following the implementation of appropriate mitigation and in fact, the proposed development could deliver a range of positive environmental effects.

In terms of flood risk, a Flood Risk and Drainage Assessment demonstrated that the development scheme and its occupants will not be at an increased risk of flooding, the scheme will not increase flooding elsewhere, and a sustainable drainage scheme can be implemented.

The HLAA correctly notes that the site is available as it was submitted to the Call for Sites, however, inconsistently, it states that no assessment of achievability or development potential was undertaken due to the site's unavailability. **It is requested that a full and proper assessment of the site is undertaken as part of a HLAA Review**.

The land to the north and east of Walton Hall Road forms part of site EAT_24 within the HLAA. The assessment considers that the site is not suitable or developable due to its location in the Green Belt, physical limitations, flood zone, agricultural land, listed buildings and Local Wildlife Sites. The points raised with regards to the Green Belt apply to this site also.

Similarly, it is considered that the physical constraints can be effectively designed into any future development proposal. Mitigation could be provided to offset any potentially adverse impacts on the environment. The achievability and the development potential of the site should be assessed.

The remainder of the subject land was not assessed as part of the HLAA although the sites were submitted to the Call for Sites exercise undertaken in April 2018. On this basis, **it is requested that the HLAA is updated to include additional sites to inform the preparation of the Local Plan, and that a full and proper assessment of sites is undertaken that would provide the evidence and justification required to support the exceptional circumstances for Green Belt release**.

Thurrock Strategic Green Belt Assessment

In the region of 60% of the land in Thurrock is designed Green Belt. The Issues and Option (Stage 2) Consultation Document promotes a brownfield first approach which aligns with national policy however, it is accepted by Thurrock Council that there will need to be some Green Belt land release in order to accommodate growth targets. An initial Green Belt Assessment has been undertaken to form part of the evidence base to the Local Plan. This assessment relates to the identification of strategic Green Belt parcels and the assessment of those parcels against the purposes of Green Belt.

This Review indicates that the land to the west, south and south-east of East Tilbury is of less than fundamental importance to the Green Belt Purposes in overall terms however, there are a number of concerns with this assessment which are considered below. Cogent's land interests fall partly within Parcels 11, 25, 30 and 35. Detail is provided in the Table overleaf.

6 | East Tilbury as a Location for Growth

Green Belt Parcel	Cogent Site Name	Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas	Purpose 2: To Prevent Neighbouring Towns from Merging into One Another	Purpose 3: To Assist in Safeguarding the Countryside from Encroachment	Overall Importance of Green Belt Parcel
11	Land to the north and east of Walton Hall Road, Land to the east of Buckingham Hill Road	Fundamental	Slight/ Negligible	Major	Fundamental
25	Land to the West of East Tilbury (part)	Major	Slight/ Negligible	Major	Major
30	Land to the West of East Tilbury (part) and Land to the West of Tilbury Village and East Tilbury	Slight/ Negligible or none	None	Major	Major
35	Land to the east and south of Coronation Avenue, Land to the east of Princess Margaret Road,	None	None	Major/ Moderate	Major/ Moderate

Parcel 11 which is assessed to be of fundamental overall importance to the Green Belt based on the purpose to check the unrestricted sprawl of large built-up areas (i.e between East Tilbury and Corringham/ Stanford-le-Hope). As set out in Appendix D of the Green Belt Assessment, the northern edge of Parcel 11 has an immediate relationship with the south western edge of Corringham/ Stanford-le-Hope, whilst this is acknowledged, it is considered that the Parcel could be subdivided and still fulfil its intended purpose.

Parcel 25 covers a significant area of countryside between Chadwell St Mary, East Tilbury, Linford, and Southfields. The Green Belt Assessment indicates that this parcel checks unrestricted sprawl of Chadwell St Mary. Given that East Tilbury lies 2km to the east of Chadwell St Mary, it is unlikely that selected development on this Parcel would lead to the merging of these neighbouring towns.

The majority of Cogent's land interests fall within Parcel 30 which includes the application site area. This Parcel plays a limited role in terms of checking the unrestricted sprawl of large built up areas and preventing the merging of neighbouring towns. The Parcel is considered to have a major role in safeguarding the countryside from encroachment however, this relates to parts of the internal lanes. It is acknowledged that the parcel could be sub-divided along the railway (Green Belt Assessment Appendix D).

Parcel 35 stretches from the eastern settlement boundary of East Tilbury to the River Thames. The importance of the Parcel to the Green Belt purposes is limited with the exception of protecting encroachment of development into the Thames estuary hinterland.

6 | East Tilbury as a Location for Growth

This review suggests that **the geographical areas covered by the Parcels are too large to inform decision about amendments to Green Belt boundaries**.

In identifying the overall importance of the Green Belt parcels, the assessment appears to base this on the highest-ranking fulfilment of one of Green Belt purposes rather than undertaking a balancing exercise that takes the fulfilment of all three purposes into account.

This approach is over simplistic, unbalanced and, at times, overinflates the findings for many parcels as it is self-evident that there is a difference between those sites considered of "Fundamental Importance" for two purposes as opposed, or compared with, those sites which are assessed as "Fundamental Importance" for just one purpose. This deficiency is particularly important when considering paragraph 138 of the NPPF which requires the drawing up of Green Belt boundaries to take account of the need to promote sustainable patterns of development. On this basis, the **adequacy of this methodology is questioned**.

The Green Belt Assessment takes the proposed Lower Thames Crossing into account. The current safeguarded route runs to the west of East Tilbury and dissects a number of Green Belt parcels. The route was subject to consultation which closed in December 2018, therefore could be subject to change which must be kept under review.

Green Belt release is required – **inevitably development in the Green Belt will result in some degree of harm to the purposes of Green Belt, and impact on openness**. The implications of development, will be more significant in some locations than others depending on the wider context, therefore it is necessary to review the Green Belt on a more granular level.

It is considered that a **Stage 2 Green Belt assessment to identify a detailed assessment of sites and boundaries in the Green Belt will be required** to identify defensible long-term boundaries and to provide recommendations on detailed boundary changes and this should be undertaken to inform the Local Plan preparation. Furthermore, as set out in the Consultation Document, any decision on the need to amend the Green Belt, must be taken as part of the wider plan-making and evidence development process.

The Green Belt Role

The subject land at East Tilbury does not perform a strong Green Belt role.

Indeed, in considering this land alongside the purposes of the Green Belt we provide the following observations:

- **Unrestricted sprawl** – the area is self-contained with several strong boundaries. This includes the built form of the existing settlement to the north and east. To the south and west a new vehicular crossing is proposed that will provide a strong and defensible boundary. This boundary is also currently characterised by high-voltage pylons.

- **Merging of towns into one** – East Tilbury is a modest sized settlement. The nearest town is Chadwell St Mary to the west of the settlement, which is separated by approximately 2 miles of open countryside therefore development is unlikely to result in the merging of towns.

- **Safeguard the countryside from encroachment** – given the lack of urban capacity available it will be necessary to utilise greenfield land to accommodate growth, however, as outlined the area is largely self-contained. A sustainable urban extension also provides scope to strengthen countryside boundaries through the use of planting, built-form and infrastructure.

- **Preserve the special setting of historic towns** – East Tilbury does have some historical buildings. These are positioned centrally and are framed around the Thames Industrial Estate and Stanford House. It is considered that a sustainable urban extension can be designed to not cause significant harm on these heritage assets. Indeed, Cogent is currently working with Heritage England and Essex County Council (Heritage) on such matters. Enabling development could actually help to ensure the longevity of historical assets.

- **To assist in urban regeneration** - Thurrock Council is reliant on a combination of brownfield and Green Belt sites to meet its objectively assessed housing need. Therefore, any development in this area would not thwart the wider urban regeneration of Thurrock. Local Plan policies are likely to continue to support growth in brownfield locations.

6 | East Tilbury as a Location for Growth

Strategic Flood Risk Assessment
Thurrock has 18 miles of riverfront therefore, much of the southern part of the Borough is susceptible to flooding. East Tilbury partially falls within the Flood Zones 2 and 3 however, there are flood defences in place. The Strategic Flood Risk Assessment (SFRA) indicates that the settlement would be impacted from a breach, the eastern side of the settlement is more significantly impacted than the western side.

Investigations associated with detailed site-specific flood risk will be undertaken at an early stage to ensure opportunities to reduce flood risk are identified early and maximised as far as possible.

A Flood Risk and Drainage Assessment, undertaken as part of the planning application demonstrated that the development scheme and its occupants will not be at an increased risk of flooding, the scheme will not increase flooding elsewhere, and a sustainable drainage scheme can be implemented. This suggests that flood risk concerns can be effectively overcome at scheme design stage.

OVERCOMING THE CHALLENGES

The Issues and Options (Stage 2) consultation document raises a number of challenges in respect of major urban extensions (Page 66). These are all legitimate concerns however, these can be addressed through the development of Cogent's land at East Tilbury.

First, the current planning application means that the first phase of development can be progressed in the short-term and begin making a contribution to local housing needs. Consultation with all of the relevant stakeholders has been undertaken as part of the application process and suitable solutions for providing strategic infrastructure have been identified. Bringing forward the infrastructure required to unlock growth would help to enable wider development at the settlement and would ensure consistent rates of delivery can be achieved.

Cogent have been engaging with other landowners in East Tilbury and are open to exploring bespoke delivery models in order to help delivery in this location.

Large scale development can change the nature/ character of an existing settlement however, it is considered that East Tilbury has the potential to comfortably absorb further development. The original plan for the settlement was to provide a garden village setting to the Bata Shoe Factory, this pattern of development can be extended whilst maintaining the integrity of the settlement and being sympathetic to the historical character.

Cogent has undertaken a comprehensive programme of consultation with local residents, business, elected representatives and community groups in East Tilbury. This means that Cogent has an understanding of the local community's concerns, priorities and future aspirations for East Tilbury. These concerns and priorities can be at the forefront of planning new development to ensure those directly impacted benefit.

The settlement has lacked investment in recent years and therefore new development will help to support upgrades to the existing social and community facilities and enable delivery of new facilities. The planning application proposes to deliver a primary school, health centre and local shop as well as new public open space and play areas. A higher quantum of development could provide the critical mass to support additional facilities to the benefit of both existing and new residents.

One of the key concerns of residents of East Tilbury is associated with constraints due to the railway crossing. East Tilbury railway station is positioned on the 'Tilbury Loop' and provides frequent services to London Fenchurch Street and Southend Central. Despite East Tilbury benefiting from high levels of accessibility, the settlement is currently severed by a level crossing within the settlement. This physical separation of East Tilbury and Linford does affect ease of access for vehicular and pedestrian flows. The planning application proposes a solution to this problem by providing a new railway crossing.

DELIVERING SUSTAINABLE DEVELOPMENT AT EAST TILBURY

This review indicates that there are no fundamental constraints at East Tilbury that cannot be overcome.

East Tilbury is a sustainable location. It has a train station on the C2C train line. As such, rail connectivity in East Tilbury is a key strength of the settlement. East Tilbury station is just a short distance from land under control by Cogent and provides regular services to key employment centres such as London (47 mins); the Port of Tilbury (Tilbury Town station, 6 mins) and DP World London Gateway (Stanford-

6 | East Tilbury as a Location for Growth

le-Hope station, 4 mins); Grays town centre (9 mins); and Lakeside Shopping Centre (Chafford Hundred Lakeside station, 13 mins). East Tilbury also has regular bus services to Grays, Stanford-le-Hope, Corringham, Chadwell St Mary and Basildon.

The NPPF dictates that plans should give first consideration to land which is well-served by public transport when it is necessary to release Green Belt land meaning East Tilbury is a highly suitable location for considering revision to the Borough's Green Belt boundaries.

There are a wide-range of shops, services and facilities in East Tilbury, within close proximity to the land controlled by Cogent. It is within immediate walking distance of a convenience store, pharmacy, post office, library, primary school, and doctor's surgery. Slightly further afield is Thurrock Thameside Nature Park, Coalhouse Fort and Gobion Park, which provides a large amount of recreational/ leisure space. New development will help to support upgrades to the existing social and community facilities and enable delivery of new facilities. The planning application proposes to deliver a primary school, health centre and local shop as well as new public open space and play areas. A higher quantum of development could provide the critical mass to support additional facilities to the benefit of both existing and new residents

East Tilbury is located between the major employment areas of Tilbury Port, Tilbury 2 and DP World London Gateway. Housing growth would provide a resident workforce and ensure alignment between the housing and the labour market, thereby reducing the need for in-commuting into the Borough to support employment growth which is supported by national policy. This is an important consideration when the economic growth aspirations for Thurrock and the Thames Estuary Growth Area more widely are taken into account.

The NPPF identifies three dimensions to sustainable development, which include economic, social and environmental. In achieving sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.

The subject land at East Tilbury has the potential to deliver the following benefits:

Economic

- **Local economy** – economic benefits arising from private sector investment, construction employment, expenditure from new resident population on leisure goods and services and the enhancement of the vitality and viability of local retail and service centres, and

- **Sustainable growth distribution** – provision of a local labour supply to support operations at Port of Tilbury, Tilbury 2, DP World London Gateway Port and Logistics Park; Port of London, and other economic growth initiatives and the effect of colocation on commuting self-containment rates;

Social

- **Housing delivery** – provision of a major sustainable urban extension providing a range of housing types and tenures to meet the local housing needs;

- **Provision of community facilities** – the provision of social infrastructure, such as a primary school and local centre and upgrading of existing facilities to meet day to day needs of residents;

Environmental

- **Improved access and congestion relief** – development of the subject land would facilitate the delivery of a new bypass with vehicular crossing over the railway line, reducing congestion;

- **Reducing the need to travel** – sustainable patterns of development close to public transport provision and local services reduces the need for travel;

- **Protection of the natural and historic environment** – provision of enhancements to biodiversity, new areas of public open space and improved landscaping.

These strategic factors underpin why sustainable urban extension at East Tilbury is critical to a successful and prosperous Thurrock and why Cogent's land should be identified for development in the new Thurrock Local Plan to deliver a sustainable urban extension of 3,000 dwellings and associated infrastructure.

Economic Benefits
East Tilbury

This infographic provides an overview of the economic benefits that could be delivered through the development of **5,000** new homes in East Tilbury. The proposed development will provide a wide range of economic benefits for the surrounding area during both construction and occupation phases.

the **occupation benefits**

first occupation expenditure
£50m

total annual resident income per annum
£310m

total household expenditure per annum
£115m

the **revenue benefits**

New Homes Bonus per annum
£8m

Council tax per annum
£8m

the **construction phase benefits**

direct construction jobs
7,500

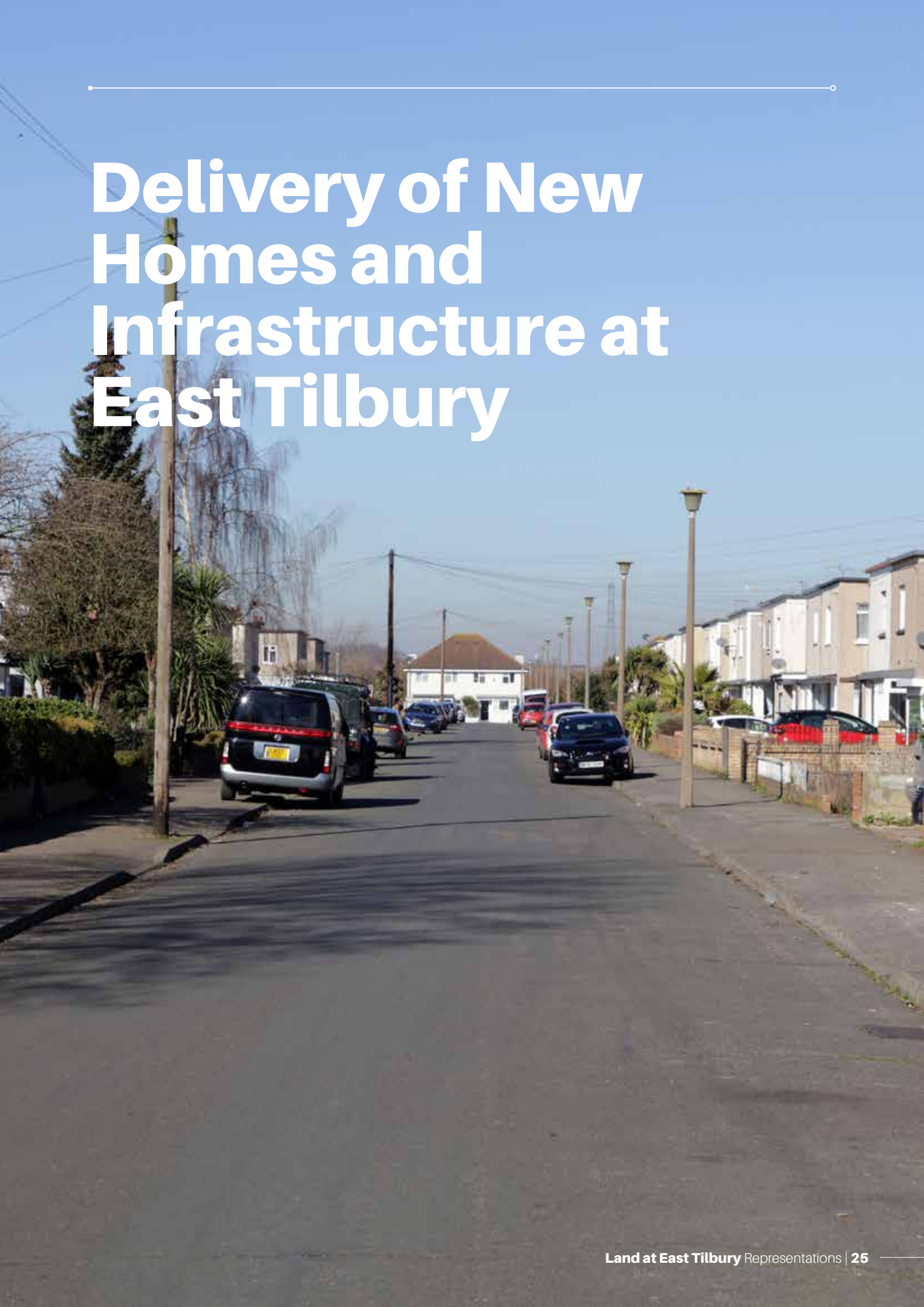
construction value
£650m

direct & indirect gva
£800m

indirect and induced jobs
12,000

Conclusion: The proposed development of 5,000- new homes in East Tilbury will provide much needed high-quality residential dwellings in line with local needs and national agenda. The considerable economic benefits resulting from the delivery of the proposal will contribute positively to the local and national economy.

Delivery of New Homes and Infrastructure at East Tilbury



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Thurrock Council's Local Plan should seek opportunities to support the economic, social and environmental objectives of the NPPF. It should be visionary and aspirational; building on the existing strengths of the Borough.

The Local Plan should be forward-facing. The Local Plan should harness the momentum of economic success in recent years by supporting these employment clusters and strive towards making a significant contribution to the success of the South Essex region and the Thames Estuary Growth Area. Moreover, in developing the spatial context for change, economic growth should not be viewed in isolation. The Local Plan should seek to align job growth with the provision of new housing pursuing an economic growth-led scenario for identifying the housing target for the Local Plan period.

In responding to housing need, some Green Belt release will be necessary. There is no dispute that a central objective of the Local Plan should be to best utilise brownfield sites in the Borough. However, brownfield land alone will not meet Thurrock's local housing needs with capacity for just 6,500 dwellings, compared with a baseline level of need of 22,200 homes, let alone the economic-led scenario of 33,500 homes. In light of these exceptional circumstances, Thurrock Council should be positively preparing a plan that identifies sites to fully meet its immediate and long-term housing need and release land from the Green Belt.

In order to achieve a robust supply position which can contribute to housing delivery throughout the plan period and ultimately future proof the assessment, the housing growth strategy will require a varied source of housing land supply, site allocations across different parts of the Borough and a range of sites. A fundamental component of this mix is large new settlements or urban extensions that can secure funding and investment in strategic infrastructure and provide a secure source of housing delivery over longer periods. Cogent's land interests at East Tilbury have the potential to provide a major urban extension to the settlement that overcomes constraints to delivery that can inhibit early delivery. This would also help to alleviate Thurrock's should need shortfalls in the short term.

To realise sustainable development the Council should look to prioritise growth by distributing in those locations that are strategically best-placed and most sustainable. First considerations should be given to land which is well served by public transport and local services in locations such as East Tilbury.

Within this context, and drawing on the information presented within these representations, the response to the specific questions set out in the Issues and Options (Stage 2) Consultation Document are provided below.

QUESTION 1

It is considered that the following evidence-based studies are required to ensure that the Local Plan is sound:

- **Stage 2 Green Belt Assessment** – a detailed assessment of sites and Green Belt boundaries will be required to identify defensible long-term boundaries and to provide recommendations on boundary changes and this should be undertaken to inform the Local Plan preparation and ensure that exceptional circumstances are fully evidenced and justified;
- **Thurrock Housing Land Availability Assessment Update** – an assessment of the suitability, availability and achievability of sites being promoted for development in the Borough including an update of sites previously assessed in addition to site submitted as part of the 2018 Call for Sites exercise;
- **Strategic Housing Market Assessment Update** – to take account of the economic drivers in the Borough;
- **Economic Development Needs Assessment Update** – to address shortcomings in the existing assessment and fully reflect the economic drivers in the Borough;
- **Integrated Landscape Character Assessment and Sensitivity Evaluation** – to inform the identification of sites for future development;
- **Thurrock Transport and Infrastructure Baseline Study**
- **Thurrock Development Capacity Study**
- **Baseline Infrastructure Study** - to identify the identify the current level of provision in the Borough and assessment of need; and
- **Infrastructure Delivery Plan** to identify how infrastructure will be delivered alongside the planned growth.

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QUESTION 2

Inn addition to joint working with the other authorities in South Essex as part of ASELA, Iceni consider that it would be appropriate for the Council to test its potential to contribute to an unmet need arising from London through the plan-making process, given the strong migration and commuting interactions between the Borough and London. Thurrock should liaise through the Duty to Cooperate with boroughs in East London on this basis.

QUESTION 7

Thurrock should look to adopt Approach B and seek to allocate enough land to meet objectively assessed housing need of 3,500 homes based on the Government's standard method and incorporating an uplift to support economic growth taking account of Borough-specific economic drivers which are considered in detail in the supporting technical evidence.

QUESTIONS 8 AND 9: AFFORDABLE HOUSING

There are two types of evidence needed to justify policies for affordable housing – evidence of need; and viability evidence. National planning policies are also relevant. The latest assessment of the need for affordable housing was set out in the SHMA Addendum. This pointed to an affordable housing need for 472 households per year (Appendix 3, Table 3.2). Iceni consider that it is incorrect to state that this would rise to 663 homes per annum over the remainder as this does not take account of the impact of new-build development from housing in the development pipeline on the annual supply of affordable housing moving forwards. It overstates it.

The affordable housing target in the Plan should be informed by viability evidence developed through a Whole Plan Viability Assessment. This should consider the implications of infrastructure costs and other policy requirements on residential development viability; the variance in residential values in different parts of the Borough; and be informed by engagement with site promoters for key strategic sites.

To be consistent with the NPPF, the affordable housing policy should reflect the definition of affordable housing in the NPPF Glossary. In considering the appropriate policy approach to the mix of affordable housing, the Council will need to draw together evidence on the mix of affordable housing needed and residential development viability. The Council should provide guidance in policy on the mix of affordable housing sought through new developments, to provide clarity to developers bringing forward development; but should then adopt a flexible approach to considering the mix on specific sites taking account of the location and nature of the development scheme.

To support the deliverability of the Plan, any policy should be written with sufficient flexibility to allow site-specific development and infrastructure costs (and the effect of these on viability) to be properly considered.

The mix of affordable housing need will be influenced by the scale of residential development in the Borough, with higher levels of housing provision influencing in-migration to the Borough. This can be expected to result a needs profile more focused towards intermediate housing products than social rented homes. Given the indication that the Plan will provide for higher housing provision than indicated by the standard method, Iceni consider that a policy which seeks higher levels of intermediate affordable housing would be appropriate.

QUESTION 11: HOUSING MIX AND SIZE

The South Essex SHMA showed that Thurrock's existing housing stock is focused particularly on semi-detached and terraced homes (Figure 8.1), with 3-bed properties accounting for almost half of the stock in 2011 (Figure 8.3). Two thirds of properties are owner occupied. However over the 2001-11 period, the majority of housing delivered was of flats, and the Private Rented Sector grew strongly.
The Addendum models the mix of homes required (by size and type) by applying the mix of homes occupied by three types of household – one person; family; and other households – to the size/type profile of homes occupied by such households shown by the 2011 Census.

Housing Mix by Bedsize - SHMA Addendum Table 5.3

	1-bed	2-bed	3-bed	4+ bed
Thurrock	13%	26%	48%	13%

The Issues and Options Consultation Document goes beyond this to specify in Figure 11 the mix of homes of both different sizes and types. Iceni considers that it is not appropriate to specify the specific type of housing to be delivered, as this will be influenced by design considerations. A household seeking a 3-bedroom house could be accommodated in either a detached, semi-detached or terraced property; and there is for instance the potential for delivery of new-build town houses to accommodate households which might otherwise consider detached or semi-detached homes in the existing stock.

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In considering policies for housing mix, the caveats in the SHMA Addendum report however need to be clearly recognised. The SHMA Addendum sets out in Paras 5.18 and 5.19:

"This modelling exercise provides an illustrative interpretation of available historic evidence to estimate the size of housing which may be required in South Essex over the assessment period. In reality, the profile of housing delivered is likely to be driven by the market, which will judge the type of housing most appropriate to meet demand at any point in time.

The analysis presented above should therefore only be used for guidance in its translation into policy and monitoring purposes of future development. While this evidence provides a valuable overall indication of the broad mix of housing which may be required, it is recommended that policies are not overly prescriptive in directly basing requirements for individual sites on the illustrative mix presented above. The individual mix of housing provided on a site-by-site basis will need to take account of local market evidence and viability considerations, which will have an important influence on the appropriate mix."

The Council should not seek to apply the SHMA conclusions on housing mix to individual sites. The SHMA itself is clear on this. There are broader considerations related to the location of sites, their accessibility, the character of the local area, local employment drivers, and what housing is being brought forward on other sites, amongst others, which will influence the mix of housing which is appropriate on individual schemes. Providing appropriate flexibility through policy – particularly in respect of market housing – will be important in supporting housing delivery, and the pace of housing delivery.

If the Council wants to implement the Nationally Described Space Standard it will need to show that there is a need to do so, including that the sizes of properties being delivered by the market are not sufficient; as well as appraise the impacts of doing so on residential development viability.

QUESTION 12: ACCESSIBLE HOMES & RETIREMENT HOUSING

Accessible, Adaptable and Wheelchair Accessible Homes

Given a growing population, and in particular a growing population of older persons, Iceni recognise that some homes should be delivered to Parts M4(2) accessible/adaptable and Part M4(3) wheelchair accessible standards. A requirement for all homes to be delivered to Part M4(2) standards is however not justified as not all new homes will need to meet these standards for there to be sufficient availability of such homes within the Borough to provide a choice of dwellings for those seeking such properties. In particular, it should not be a requirement for all market homes to meet Part M4(2) standards as this would impact on the viability of the scheme.

Retirement Housing

Older persons housing needs have been assessed in the SHMA and SHMA Addendum. This is based on applying prevalence ratios from the SHOP toolkit, developed by the Housing Learning and Improvement Network (Housing LIN) to the projected population growth.

The analysis is relatively high-level and simplistic, and Iceni does not consider that it represents a sufficiently robust evidence base upon which to develop the Local Plan.

The Turley SHMA analysis simply applies national prevalence ratios from Housing LIN to population projections for the Borough. There is no consideration of:

- The adequacy of existing supply – including in terms of quality and choice of existing accommodation and whether it is fit-for-purpose, and gaps in supply (either in terms of the type of accommodation or spatially within the Borough;
- Whether there is a current unmet need for different types of accommodation for older people, which should be added on to the future need, in assessing gross development needs in accordance with the PPG;
- Local factors which may affect prevalence ratios, including socio-economic and strategic influences.

Housing LIN has been clear that the Toolkit should form one part of the evidence base and used alongside qualitative and other locally-specific contextual data. It indicates that existing prevalence rates in the local area should be assessed, and that assessments should involve detailed discussions with relevant stakeholders to ensure future prevalence rates used in modelling are calibrated to local circumstances and factors that will influence need. This has not been done in Turley's high-level assessment, which therefore cannot be considered as a fit-for-purpose evidence base for plan-making.

Iceni consider that an approach which identifies areas which should accommodate specialist housing is preferable to a generic approach requiring sites over a certain size

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to provide such provision. Such an approach can take account of existing provision within individual settlements and provide certainty to specialist housing providers as to where such development will be supported. Such provision should be situated in locations where it is accessible to local services and public transport.

QUESTION 17

Adopting an approach that takes forward major urban extensions to accommodate at least 1,500 homes as sustainable urban extensions is supported. Based on the evidence in the HLAA, focusing development in the urban areas will only deliver less than 6,500 new homes meaning that the Council must consider other spatial options for accommodating growth. Major urban extensions (1,500 dwellings +) provide opportunities to deliver sustainable development whilst making a significant contribution to housing needs. The developments provide the critical mass to warrant the delivery of additional infrastructure and services and facilities that may not be viable to provide as part of a small quantum of development associated with smaller urban extensions, village expansion or isolated site allocations.

The NPPF (paragraph 72) acknowledges that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.

Cogent's land holding at East Tilbury has the potential to accommodate a new urban extension either in isolation or in combination with other sites being promoted in this location. The current masterplan for 1,000 dwellings can deliver the first phase of this growth of a major urban extension of at least 3,000 dwellings in this location. Cogent have been engaging with other landowners in East Tilbury and are open to exploring bespoke delivery models in order to help delivery in this location.

The planning application means that the first phase of development can be progressed in the short-term and begin making a contribution to local housing needs. Consultation with all of the relevant stakeholders has been undertaken as part of the application process and suitable solutions for providing strategic infrastructure have been identified. Bringing forward the infrastructure required to unlock growth would help to enable wider development at the settlement and would ensure consistent rates of delivery can be achieved.

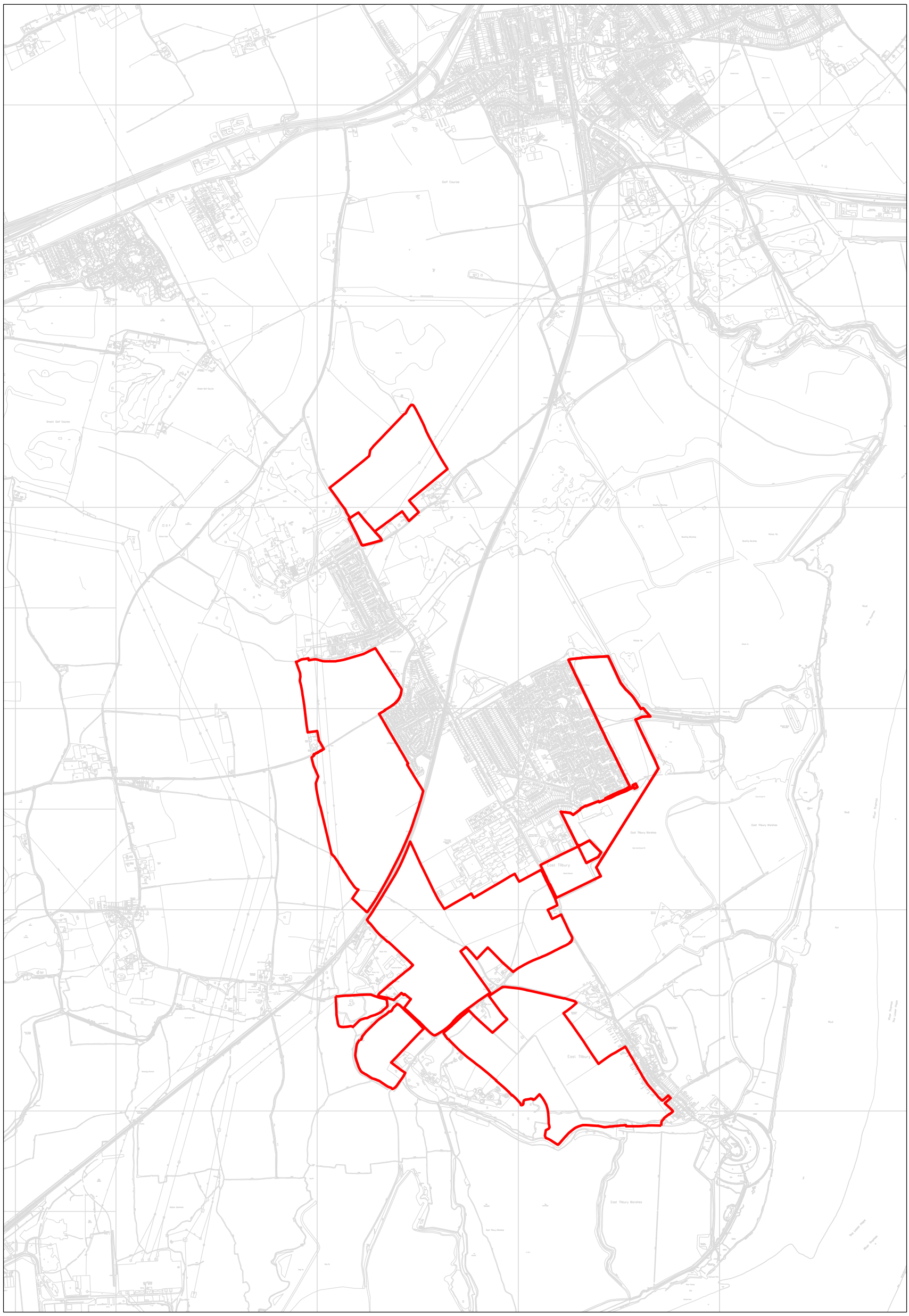
Large scale development can change the nature/ character of an existing settlement however, it is considered that East Tilbury has the potential to comfortably absorb further development. The original plan for the settlement was to provide a garden village setting to the Bata Shoe Factory, this pattern of development can be extended whilst maintaining the integrity of the settlement and being sympathetic to the historical character.

Cogent has undertaken a comprehensive programme of consultation with local residents, business, elected representatives and community groups in East Tilbury. This means that Cogent has an understanding of the local community's concerns, priorities and future aspirations for East Tilbury. These concerns and priorities can be at the forefront of planning new development to ensure those directly impacted benefit.

The settlement has lacked investment in recent years and therefore new development will help to support upgrades to the existing social and community facilities and enable delivery of new facilities. The planning application proposes to deliver a primary school, health centre and local shop as well as new public open space and play areas. A higher quantum of development could provide the critical mass to support additional facilities to the benefit of both existing and new residents. A transport solution to existing constraints meaning that connectivity could be improved.

In summary, the subject land could make a meaningful contribution to meeting Thurrock's local housing need and represents an exceptional fit with Thurrock's objectives for the Borough.

Appendix 1
Site Plan



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Project Thurrock Local Plan	Job Ref. 15-M022	Drawn NM	
Drawing Title Collected Sites	Scale 1:20,000 A3 1:10,000 A1	Date 05.03.2019	
	Drawing no. 005	Rev.	

Appendix 2
Reviewing the Housing and Economic Evidence

Thurrock Issues and Options: Reviewing the Housing & Economic Evidence

Iceni Projects Limited on behalf of

Cogent Land LLP

March 2018

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MARCH 2018

ICENI PROJECTS LIMITED ON BEHALF OF COGENT LAND LLP

Thurrock Issues and Options: Reviewing the Housing & Economic Evidence

CONTENTS

1. SUMMARY

1.1 This report reviews the existing housing and economic evidence which supports Thurrock's emerging Local Plan, identifies key economic drivers in the Borough and assesses the implications of these for housing and employment land needs. It has been prepared to assist the Council in further developing the Local Plan.

1.2 The standard method set out in Planning Practice Guidance provides a baseline minimum level of housing need which should be planned for. Taking household growth for 10 years looking forwards from 2019 and an adjustment to improve affordability, this equates to 23,378 dwellings in Thurrock over the 2018-38 period (1169 dpa).

1.3 Iceni welcomes the Council's recognition of the need to consider planning above this minimum level to ensure its economic growth ambitions are achieved in a sustainable manner. We note that the SHMA Addendum conclusions on Thurrock's housing need would show a need of 30,730 homes over the plan period but that the SHMA authors were clear that this should not be regarded as a definitive view on future performance.

1.4 Within the report, Iceni has reviewed the South Essex Economic Development Needs Assessment. The EDNA recognises that there is strong economic growth potential in Thurrock, but has not sufficiently interrogated local economic drivers. In particular the forecasting element of the EDNA need to be revisited. The forecasting of industrial development needs has not adequately examined local demand drivers, the interaction between employment numbers and floorspace, and appears to contain errors in the modelling of warehouse floorspace needs.

1.5 Iceni's analysis points to expected strong employment growth in Thurrock which is underpinned by:

- Its location which is **close to London** – the UK capital, its economic heart and a major economic and population centre – and **on major transport arteries** – the A13 and M25 which provide access both to the Capital but are also an important route between other parts of the country and ports;

- The **growth of the borough's Ports** which will support additional creation both within the Port estate and in warehousing and logistics activities. The ports coupled with the availability of employment land (which is constrained in many other parts of London and its immediate surroundings) affords Thurrock a strong competitive advantage in attracting growth in logistics sector. There is policy support for this at a range of levels, and a **particular opportunity in port-centric logistics**, which differentiates the opportunity in Thurrock from other locations;

- **Major infrastructure investment**, which will address congestion on the strategic road network, including the short-term improvements to the A13, providing three lanes each way between Stanford-le-Hope and the M25; with the prospect of delivery of the Lower Thames Crossing in the longer-term which will improve journey times and the reliability of the Strategic Road Network. We would expect that the completion of improvements to the A13 will provide a spur to take up of employment land around Stanford-le-Hope;

- **Labour availability**, which will be influenced by housing growth within the Borough itself, and the Borough's accessibility which afford access to a wide labour pool extending to other parts of Essex, East London and North Kent.

1.6 Iceni's analysis suggests that the delivery of Tilbury 2 and the growth of London Gateway will support growth in employment on the Port estates. The Thames Oilport will support growth in jobs in petrochemicals.

1.7 It identifies significant demand for new industrial floorspace arising from a combination of existing local occupiers seeking newer floorspace; from businesses relocating from London where land supply is constrained; and from port-related logistics growth. The report finds that looking specifically at this, a significantly higher quantum of industrial land is required than identified in the EDNA. Investment in improvements in highways network capacity will support this.

1.8 Additional job growth can also be expected to arise from the expansion of Lakeside Shopping Centre and regeneration of Grays and Purfleet Town Centres; and through wider multiplier effects.

1.9 Iceni has sought to model job creation which can be expected to arise, and taking a cautious approach consider that employment growth of at least 33,800 jobs can be expected over the plan period. Our analysis shows that this would result in:

- A need for at least 33,500 homes over the plan period (2018-38);

- A need for at least 584 ha of B-class employment land.

1.10 This scale of development is realistic given the Borough's location, its economic attributes and evidence of expected housing under-delivery in London. It would see the Borough contribute positively to the Thames Estuary 2050 Growth Commission's vision to deliver 1.3 million new jobs, £190 billion additional Gross Value Added (GVA) and 1 million new homes to 2050.

1.11 Iceni's assessment makes no specific provision for jobs arising from town centre regeneration, the Lower Thames Crossing or other local investment / economic opportunities. It should be regarded as a minimum level of provision and the Council should undertake detailed work to assess economic growth potential as part of the development of the Plan.

2. INTRODUCTION

2.1 Thurrock Council is undertaking an Issues and Options Consultation. Iceni Projects ("Iceni") has prepared this report to consider the housing and economic evidence which sits behind the emerging Local Plan, and which has informed (and is referred to in) the Issues and Options Consultation Document. It has been prepared with a view to assisting the Council in developing the Plan and addresses a number of questions raised within the Consultation Document.

2.2 This report considers issues related to the level of housing need, and level of housing growth which should be planned for. Our analysis addresses the standard model set out in Planning Practice Guidance, as well as Thurrock's relationship with London. As identified in the Issues and Options Consultation, economic growth within the Borough is expected to be an important influence on and driver of housing need. It also makes good planning sense to seek to align the strategies for housing and employment land provision in the Borough, and indeed doing so will support the robustness of the Plan.

2.3 What Iceni has done is to review the Council's existing evidence base – including the South Essex Strategic Housing Market Assessment (SHMA), the Government's standard method, and the South Essex Economic Development Needs Assessment (EDNA). The SHMA findings are influenced by how the Borough's economy is expected to perform; but do not properly take account of key economic drivers in the Borough – including the expansion of the borough's ports; B8 logistics/ distribution development associated with this, displacement of industrial activities from London and improvements to the strategic road network; as well as the expansion of Lakeside Shopping Centre; and the impacts which these major growth drivers can be expected to have on the local economy more widely. Our view is that it will be necessary to update elements of the EDNA and SHMA analysis to provide a robust evidence base.

2.4 To assist the development of the Local Plan, we have sought to bring together an analysis of the effect of these drivers on expected economic growth in the Borough. We have then gone on to model the implications of this on housing need.

Report Structure

2.5 The remainder of this report is structured to address:

- Section 2: Issues in assessing housing provision;
- Section 3: The Council's existing evidence base;
- Section 4: Thurrock's economic growth potential;

- Section 5: Implications for housing need;
- Section 6: Implications for employment land.

2.6 Iceni would welcome the opportunity to come and discuss the report contents with Thurrock BC officers, and the Council's consultants.

3. ISSUES IN ASSESSING HOUSING PROVISION

3.1 The 2019 NPPF is clear that plans should provide a strategy which, as a minimum, seeks to meet the area's objectively assessed housing needs; and is based on effective joint working which addresses unmet need from neighbouring areas where this is consistent with achieving sustainable development and other policies in the Framework.

3.2 The Consultation Document sets out that process for formally agreeing the future scale of new housing development will be the Joint Strategic Plan (JSP). Para 2a-013 in the PPG is clear that there a spatial development strategy is being prepared, "*the housing need for the defined area should be at least the sum of the local housing need for local planning authority within the area. It will be for the relevant strategic policy making authority to distribute the total housing requirement which is then arrived at across the plan area."* What this means in practice is that the JSP can be expected to address the distribution of development which takes place in different local authorities across South Essex. Thurrock Council's work in preparing its Local Plan, and its involvement – with the other South Essex local authorities – in preparing the JSP, can however be expected to interact with one another.

3.3 Planning Practice Guidance (PPG) is clear that the assessment of housing need is an <u>unconstrained</u> assessment which is the first step in the process of deciding how many homes need to be planned for (Para 2a-001). It should be undertaken separately from consideration of land availability and development constraints. We have taken this into account in the preparation of this report.

3.4 The PPG sets out that the standard method should be used to calculate the minimum annual local housing need. This is an important "starting point", but the Guidance is clear that there may be circumstances in which it is appropriate and justified to plan for a higher housing need figure. The Issues and Options Consultation essentially asks whether the Council should for housing provision above the standard method figure (1173 dpa).

3.5 Para 2a-010 in the Guidance states that the standard method "*does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour*" and there will be circumstances where it is appropriate to consider where <u>actual housing need</u> is higher than the standard method indicates. It identifies circumstances where this might be the case as including:

- where there are funding strategies in place to promote and facilitate growth;
- strategic infrastructure improvements are envisaged that are likely to drive an increase in the homes needed locally; or

- an authority agrees to take on unmet need from neighbouring authorities, as set out in an SOCG.

3.6 The Guidance is clear that these issues should be considered separately from supply-side factors which influence what level of housing provision can be accommodated and what the appropriate housing target might be. They issues identified above are ones which affect what the need is.

The Standard Method Baseline

3.7 On the basis of the above, Iceni has sought to first of all consider what the housing need baseline is. Our analysis notes that in February 2019 Government updated the NPPF and Planning Practice Guidance, and we have taken this into account. The updated Guidance is clear that:

- The baseline for assessing housing need should be determined using the 2014 household projections, which should be used to calculate average annual household growth over a 10 year period looking forwards from the current year;
- An affordability adjustment should be applied based on the latest published workplace-based affordability ratio; and
- That a cap, where it is applicable, affects what the "minimum local housing need" figure is, but does not limit the housing need itself. Where a cap is applicable, consideration can be given to whether a higher level of need could realistically be delivered (PPG Para 2a-007).

3.8 Iceni has sought to assess the 'starting point' level of housing need which arises through the application of the standard method. We have done so both for Thurrock Borough over the plan period for the Local Plan (2018-37/8), and for the ASELA area considering needs over the JSP Plan period (2018-38). The plan period for Thurrock's Local Plan is referred to as running to 2037 at some points in the Consultation Document and to 2038 at others. Both time periods are therefore shown.

Table 3.1 Local Housing Need calculated using the Standard Method

	Thurrock	ASELA
Household Growth pa, 2019-29	850	3,289
Median Affordability Ratio, 2017	10.0	
Affordability Adjustment	38%	42%
Step 2 Uncapped Local Housing Need	1,169	4,639
Previous Local Plan Figure	925	
Step 3 Capped Minimum Local Housing Need	1,169	4,583
Need 2018-37	22,209	87,073
Need 2018-38	23,378	91,656

3.9 Our figure for Thurrock's Local Housing Need, at 1169 dpa, is slightly below the 1,173 dpa figure in the Consultation Document as we use household projection data for the 2019-29 decade (rather than 2018-28) which has a modest, but essentially inconsequential impact.

3.10 At an ASELA level, there are no authorities which have an adopted plan which is less than five years old (or which has been reviewed and found not to require updating). A cap is therefore applicable to the higher of either the household projections; or latest adopted requirement in strategic policies. In all cases for authorities in the ASELA area, the cap is applied to the household projections. The effect of this is to cap the affordability adjustment in Brentwood, Castle Point and Rochford.

3.11 The standard method thus shows to a minimum housing need for 87,100 homes (2018-38) across the ASELA area; and an uncapped housing need for 91,700 homes (2018-38). For Thurrock, the standard method points to a need for 23,380 homes (2018-38).

3.12 Iceni would note that the Government has committed to reviewing the standard method over the course of the next 18 months. The Council will need to respond to changes in Government policy and guidance as the plan progresses.

Thurrock's Economy and Strategic Infrastructure

3.13 The Consultation Document states that:

"unlike the assessment of housing need in the SHMA 2017, the standard method fails to consider whether any adjustments should be made to the housing requirement to ensure that the provision of new housing addresses any imbalance between the available labour supply and the projected rate of job growth in the Borough. Therefore it will be necessary through ongoing work on the Local Plan, to carry out additional technical work to assess the implications of using the standard method to calculate housing need on the economic growth of the Borough.

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

3.14 Iceni welcomes the positive recognition within this that there is a need to explore that a higher level of housing need, above the standard method, may be necessary to support the borough's economy

and Council's economic growth ambitions. We agree that it is appropriate, and indeed necessary, to look at this issue.

3.15 As the Consultation Document explains an imbalance between jobs and homes could hinder economic investment and result in unsustainable commuting patterns.

3.16 Furthermore, there is a degree to which an aligned strategy for jobs and homes can be mutually supportive – with an available labour supply locally helping to attract business and economic investment (particularly in the context of a relatively tight labour market across the wider region); and the availability of and growth in jobs assisting, and movement of people to fill these jobs, supporting demand for new housing. It is common for Inspectors at Local Plan Examinations to test to consider (and where necessary question) the alignment of strategies for housing and employment.

Relationship with London

3.17 Given Thurrock's geographical location, a further consideration in planning for housing is Thurrock's relationship with London.

3.18 Looking for instance at the last three years data, out-migration from London has accounted for two-thirds (66%) of flows of people from other parts of the UK to Thurrock. Taking account of international migration flows as well, people moving from London account for 57% of total migration to Thurrock. It is clear therefore that **whilst Thurrock is notionally defined as within a South Essex Housing Market Area, London has a very strong influence on its housing market**.

Table 3.2 Migration Flows from London to Thurrock, 2014-17

	Total Domestic Inflow	Total International Inflow	From London	% Domestic Flow from London	% Total Inflow from London
2014-15	7,219	1,211	4710	65%	56%
2015-16	7,298	1,386	4870	67%	56%
2016-17	8,898	1,109	5920	67%	59%
Total	23,415	3,706	15,500	66%	57%

Source: ONS Migration Matrices

3.19 What this means is that any shortfall in housing provision relative to housing need in London could result in additional out-migration from London to Thurrock.

3.20 The London SHMA has assessed London's housing needs (using the 2012 NPPF approach) as 66,000 homes per year. The London Plan proposes provision of 65,000 homes a year. However the Secretary of State for Housing, Communities and Local Government wrote to the Mayor of London

on 27th July 2018[1] indicating that he considered that London's housing needs had been under-estimated and the GLA 2017 SHMA methodology did not reflect the full extent of housing need in London to tackle affordability problems.

3.21 The Secretary of State's written representation to the London Plan Examination[2] have confirmed this position and set out that once the London Plan has been finalised and published, if the housing requirement set out is significantly lower than that derived from the standard methodology in the 2018 NPPF, then the Mayor would be required to work towards an early review of the London Plan to address this. The standard methodology generates a need for 72,800 homes per year across London.

3.22 The evidence therefore essentially points to an unmet need for around 7,800 homes per annum across London, which would equate to a total unmet need for 156,000 homes over the Thurrock plan period (2018-38). The London Plan Review will consider whether there is further capacity which can be released in London. However there is also a deliverability issue, and Iceni notes that London has failed to achieve the lower housing target of 42,000 homes per year in the current London Plan in recent years. In the context of a clear unmet housing need from an adjoining area, Iceni consider that Thurrock should test its potential to make a contribution to meeting London's unmet housing need.

Iceni consider that it would be appropriate for Thurrock BC to test its potential to contribute to an unmet need arising from London through the plan-making process, given the strong migration and commuting interactions between the Borough and London. It should liaise through the Duty to Cooperate with boroughs in East London on this basis.

[1] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/730327/20180727_Letter_from_Secretary_of_State_to_the_Mayor_of_London_on_the_London_Plan_and_the_NPPF.pdf

[2] https://www.london.gov.uk/sites/default/files/m17_mhclg_2631.pdf

4. THE COUNCIL'S EXISTING EVIDENCE BASE

4.1 The Consultation Document recognises the need to progress further work to consider the implications of housing provision in line with the standard method on economic growth; whether an upward adjustment should be made to this to support economic growth and the Council's economic growth ambitions; and to calculate what this might be. The key issues here are essentially:

- How is the borough's economy expected to perform and what level of employment growth is expected over the plan period;
- What assumptions should be made in relating economic and employment growth to demographics and housing provision.

4.2 The Council has done some work on these issues already. However having reviewed this, Iceni has some concerns regarding the approach taken in aspects of the existing evidence base, and in particular key assumptions. These are set out herein with a view to be helpful, and seeking to inform further work to be undertaken on these issues.

4.3 Section 5 in the Issues and Options Consultation Document identifies that employment growth of 24,500 is expected over the plan period (page 77). It identifies a requirement for 259 ha of B-class employment land over the period to 2036; noting that this falls substantively below existing supply (652 ha) but that whilst this might represent an oversupply in quantitative terms, much of the Borough's potential future employment land supply is focused on land at London Gateway and Thames Enterprise Park. The capacity of these sites to accommodate residential development or as either an alternative use or mixed-use redevelopment is limited due to the presence of constraints under the HSE Control of Manor Accident Hazards (COMAH) Regulations or flood risk which render them unsuitable locations for housing.

4.4 Having reviewed the evidence, **Iceni however consider that the both the level of expected employment growth and of employment land needed in the Borough over the plan period has been significantly under-estimated**. We consider this in this, and the next section.

2017 Strategic Housing Market Assessment Addendum

4.5 The 2017 SHMA Addendum, prepared by Turley, provided an assessment of the objectively assessed housing need (OAN) using the approach and methodology set out in 2014 Planning Practice Guidance.

Headline Findings on OAN

4.6 In headline terms the SHMA identified an OAN of between 3,750 – 4,000 homes over the 2014-37 period across the five South Essex authorities, of which the OAN in Thurrock constituted 1074 – 1381 dwellings per annum (dpa).

4.7 Whilst the OAN was expressed as a range, the SHMA was clear that the upper end should in effect be regarded as the OAN. Para 6.9 in the SHMA Addendum for instance set out that "*it is recommended that greater weight is given to the upper end of the OAN range in the assessment of the five year housing land supply at an authority level and in the development of Local Plan policy*." Iceni has therefore used these higher figures.

4.8 For comparative purposes, we have sought to identify a 2018-38 position by taking the annualised need figures, calculating a requirement over the period to 2038 and then deducting net completions over the 2014-18 period based on monitoring data. This gives a housing need of:

- 30,740 dwellings over the 2018-38 period in Thurrock; and
- 88,300 dwellings over the 2018-38 period across the five South Essex authorities.

Table 4.1 OAN identified by the 2017 SHMA

	Thurrock	HMA
Demographic starting point	869	3,021
Adjusted demographic projection	976	2,418
Market signals adjustment	1,074	3,760
Supporting likely job growth	1,381	3,986
Implied OAN range, 2014-37	1074-1381	3750-4000
Need 2014-38 (higher end)	33,141	92,000
Completions 2014-18	2,401	7,679
Equivalent Need, 2018-38	30,743	88,321

Using the 2017 SHMA figures should thus show a level of housing need in Thurrock of 30,740 homes over the plan period (2018-38). This is 7,200 above the baseline provided by the standard method.

"Likely Future Jobs Growth"

4.9 The SHMA Addendum included upward adjustments to migration to support employment growth, at both a Thurrock and HMA level. It took assumptions on employment growth from the South Essex Economic Development Needs Assessment (EDNA) using the "adjusted baseline" forecasts

developed therein which showed employment growth of 27,994 in Thurrock over the 2014-37 period; and 62,675 jobs across the South Essex HMA.[3] The consultants Turley however made clear:

"this represents the baseline level of job growth considered likely in the EDNA which is considered appropriate to use as the basis for assessing future housing need in accordance with the PPG. The EDNA includes further employment growth sensitivity scenarios around this baseline to provide a range of employment growth scenarios for each authority. It is understood that these scenarios are intended to move beyond a baseline view of job growth to take account of future policy intervention, amongst other factors, and it is therefore important to distinguish between 'policy on' and 'policy off' scenarios in the objective assessment of the related need for housing, as previously recognised by the Planning Inspectorate.

On this basis, it is considered appropriate and important to establish the housing need implications of the EDNA baseline scenario, with any subsequent supporting of 'policy on' growth scenarios a matter for the Councils to consider as their respective Local Plans are prepared. This will require a broader consideration of the wider policy interventions necessary to support implied levels of job growth and the potential implications of any subsequent redistribution or variant distribution of job growth between the authorities."

4.10 Turley were clear therefore that the economic scenario which was modelled in the SHMA Update **should not be regarded as a providing a definitive view on future economic performance**. Turley clearly envisaged that further work might be necessary to consider local factors and strategic ambitions which might influence what scale of employment growth should be planned for. Iceni welcomes the recognition that further work to consider expected economic performance is warranted.

Assumptions used in relating Jobs Growth to Homes

4.11 Reviewing the SHMA Addendum, it used the following modelling assumptions in relating employment growth and housing need:

- Base 2014-based Population and (Stage 2) Household Projections, which adjustments then made to household formation rates for younger households aged 15-24 and 25-34, returning these to 2001 levels by 2024, and tracking changes in the base projections thereafter.
- A 2011 Census vacancy rate of 2.4% is used in relating households to dwellings. This is held constant;
- Modelling changes in economic activity by applying assumptions on age/sex-specific changes from the Office for Budget Responsibility (OBR) 2015 Fiscal Sustainability Report to a 2011 Census baseline for Thurrock;

[3] SHMA Addendum, Table 3.3

- Adjustments to unemployment which take data to 2015, and then model a return to the pre-recession position (based on a 2004-7 average) by 2020, which for Thurrock represented a modelled reduction from 5.6% to 4.4%;

- An allowance for double jobbing based on the average shown using Annual Population Survey data for the 2006-15 period; and

- Using a 2011 Census 'commuting ratio,' which for Thurrock is 1.21, and holding this constant over the forecast period.

4.12 Iceni considers it appropriate to use the 2014-based Household Projections (which the Government now recommends for use as a baseline in the standard method), but that the Stage 1 outputs should be used. The Stage 1 outputs are based on longer-term trends in household formation using data from progressive census' since 1971; whereas the Stage 2 projections (as used by Edge Analytics) are based on trends shown between 2001-11 only – an atypical period in which affordability declined significantly and there was an economic recession and housing market downturn, the affect of which was to significantly constrain both household formation amongst younger households and housing market activity. Projections based on multiple data points are also likely to be more reliable than those based on just two data points, the use of which can result in significant margins or error.

4.13 In respect of economic participation, we consider it appropriate to use OBR economic activity rates but note that these have been updated with a new set of projections released in July 2018.[4] As these represent the latest information and take account of the latest data, these should now be used.

4.14 We consider the approach to modelling changes to unemployment, double jobbing and commuting to be reasonable.

Economic Needs Assessment

4.15 The South Essex Economic Development Needs Assessment (EDNA) was prepared by GVA (now Avison Young). It considers economic and commercial property dynamics across the five South Essex local authorities, and assesses future needs for B-class employment land. Iceni has reviewed the EDNA, with a particular focus on its findings for Thurrock.

4.16 The EDNA is positive about the prospects for South Essex identifying that whist it has some structural challenges, including a decline in traditional activities and infrastructure deficiencies, its location, connectivity, labour force and land assets mean that **the sub-region could capture a greater share of regional growth with potential essentially for above-trend growth moving forwards** (Para

[4] https://obr.uk/fsr/fiscal-sustainability-report-july-2018/

1.2). This arises in part from port expansion in Thurrock; from the sub-region's location and relationship with London and potential to capture businesses displaced from the capital where there are employment land supply constraints; and the strengthening of specialist clusters which have strong growth prospects, including advanced manufacturing and engineering; logistics; and the creative, health and green sectors. There are opportunities in Thurrock in each of these.

4.17 Indeed the EDNA identifies a number of strategic and locally-specific growth opportunities in Thurrock, including:

- Port-related growth – at London Gateway and the Port of Tilbury;
- Displacement of both people and industrial land from London;
- Major town centre regeneration proposals, including Lakeside;
- Creative-industries growth potential, in particular associated with the High House Production Park; and
- Major infrastructure investment, including improvements to the A13 and proposals for the Lower Thames Crossing.

4.18 Thurrock is found to have the youngest population profile of the South Essex authorities (Figure 4) and has seen the strongest population growth (Figure 3). Yet whilst economic participation is strong (Figure 5) it has a higher relative unemployment rate than neighbouring authorities, albeit one that has fallen. The skills profile is however relatively weak, with modest proportions of the borough's workforce employed in higher-skilled roles (Figures 7 and 8). This is borne out in below average earnings, particularly of those working in the Borough, and the economy's productivity performance (GVA per capita).

4.19 What stands out from the EDNA's profiling of the commercial property market is the very strong concentration of industrial floorspace in the Borough, at over 1.1 million square meters of space (2016) equating to 49% of the South Essex total. This points to a sizeable and established market for industrial and logistics/distribution space. Whilst the evidence showed a higher level of available space, considered in context the data shows that this was effectively a function of the volume of new space being brought forward at major sites around Stanford-le-Hope (including London Gateway and the Thames Enterprise Park) which demonstrates market demand for new space exists. In comparison, the EGA points towards a more modest office market, with existing space particularly focused in Grays.

4.20 The EDNA reports an employment land supply position in Thurrock of 630 ha of employment land across 53 existing sites of over 0.25 ha. Where GVA identified vacant land, this has been identified and assessed in respect of its contribution to future supply in Section 7 of the report.

Quantitative Forecasts

4.21 Section 8 in the EDNA develops economic growth scenarios which are then used to establish employment land needs. The consultants essentially took a baseline scenario from the East of England Forecasting Model (EEFM), using the 2016 forecast run, and then made adjustments to this based on analysis of local economic drivers to derive a combined syntheses forecast which was considered to represent a robust and realistic assessment of the expected growth in each local authority and the sub-region as a whole.

4.22 The baseline EEFM forecast showed growth of FTE jobs in Thurrock of 11,928 over the 2016-36 period, equivalent to 16% growth over a 20 year period. The majority of growth in this forecast was in non-B class sectors. Jobs in office-based activities were expected to grow by 2,341; in manufacturing/ industrial activities by 545; and in warehousing by 321 (EDNA Para 8.126). What is striking about this is that it points to a very different profile of employment land demand than the commercial market analysis in the EDNA which pointed to a stronger market for industrial/warehouses premises in the Borough than offices.

4.23 For Thurrock, the EDNA made the following adjustments were made to the baseline EEFM forecast:

- B8 demand adjustment: an adjustment to the 'suppressed' B8 requirements in the base forecast which do not reflect the 'high demand' for B8 floorpace in Thurrock (EDNA Para 8.36);
- London industrial demand relocation adjustment: as a result of the release of industrial land in London and displacement to Thurrock; and
- Creative industries growth: upward adjustments to take account of potential growth in creative industries.

4.24 Iceni agree that there is a case for adjustments to the baseline forecasts in these areas (and indeed in others); but consider that the rationale for the *specific adjustments made* in based on a high-level analysis which lacks sufficient consideration. We also consider that the EGA has not had sufficient regard to other indicators of demand.

4.25 Considering first the "B8 demand adjustment" in the EGA, the report describes "high demand" for new B8 floorspace in Thurrock, average annual take-up of 76,000 sq.m per annum in the Borough over the previous 5 years, indicates that there are no signs of this demand abating (EGA Para 8.128). However from here it adopts a convoluted approach, stating that:

> *"Based on the current stock estimate of 1,198,000sqm, this suggests that floorspace is increasing by c. 6% per annum. Considering employment has grown by c. 3% per annum, this suggests that floorspace demand equates to double the employment land demand.*

When planning for the future it is difficult to know how long the levels of demand will remain this high, however there is potential to support the approach of modelling higher performance over the short and medium term, with a return to a closer alignment between employment and floorspace in the longer term. This translates into an annual 6% growth uplift between 2016 and 2027, which reduces to 4% between 2027 and 2036. Beyond the defined projection period for this Study, this can be stepped down further to 2% between 2037 and 2045 (which is the furthest extent of the EEFM projections)."

4.26 No justification is given as to why there is a significant disconnect between the rate of employment and floorspace growth. We suspect that these are drawn from different data sources and consider that extreme case should be used in comparing them.

4.27 No explanation is given why a lower rate of growth in B8 floorspace is assumed post 2027, and then beyond 2037. This does not appear evidence based. Indeed it also appears as if the calculations contain errors. If we take the current floorspace figure of 1,198,000 sq.m (EDNA Para 8.129), assume 6% pa growth in floorspace between 2016-27 and 4% growth pa 2027-36, we find total floorspace of 3,236,841 sq.m in 2036; with growth of 2,038,841 sq.m over the 20 year period (as opposed to 944,141 sq.m in GVA's figures). It appears that GVA may have done is to apply the growth rates erroneously to the suppressed baseline forecasts (which is illogical).

4.28 We note that a simple projection forward of the 76,000 sq.m pa take-up would show a need for 1,520,000 sq.m. The forecast provision of 944,000 sq.m falls well below this and it is unclear why this is the case; or it reasonable. It is certainly not justified by the assessment.

4.29 More fundamentally our concern is that the forecast methodology used has not been informed by a clear understanding of what underlies the market strength and recent strong take-up of B8 floorspace in the Borough. There is no consideration within the EGA of distribution sector market dynamics; the effect of highways infrastructure improvements on influencing Thurrock's competitive advantage for this sector; and of the growth of port-centric logistics.

4.30 We then turn to the London Industrial Land Relocation Scenario. GVA consider that Thurrock is well placed to accommodate <u>a significant proportion</u> of industrial activity (B1c, B2 and B8) which is displaced from London. They estimate displacement of 926,000 sq.m of industrial space over a 20 year period from the 'Thames Gateway Area' within London. GVA set out that "*it is reasonable to expect to see a 40% uplift in future industrial activity*" as a result of the relocation of existing industrial activity from London. It appears that what they mean is that Thurrock captures 40% of industrial activity displaced from the Thames Gateway Property Market Area within London, which comprises East and SE London Boroughs. GVA then assume a 30% industrial/ 70% distribution split of this, which is calculated as a requirement for 118,180 sq.m of manufacturing space and 259,420 sq.m of warehouse land.

4.31 It appears that the warehouse floorspace which is expected to be displaced from London is subsumed within the B8 demand adjustment calculated previously without any consideration of whether this is appropriate or not. This issue warrants more detailed consideration.

4.32 The final adjustment which has been made for Thurrock relates to the Creative Industries Growth Scenario. The report sets out that a 1% adjustment pa has been made to the forecast for this sector on the basis of the multiplier effects associated with 2,000 additional jobs at Purfleet Centre. These results in modest upward adjustments to B-class sectors (+304 sq.m office floorspace; 91 sq.m manufacturing floorspace and 178 sq.m warehouse floorspace).

4.33 If we bring together the employment and floorspace figures from the baseline and combined scenarios, the following is shown:

Table 4.2 EGA Baseline and Combined Scenarios

	FTE Jobs		**Floorspace (sq.m)**	
Scenario	Baseline	Combined	Baseline	Combined
Office	2,341	2366	28,093	28,397
Manufacturing/ Industrial	545	548	19,626	19,719
Warehouse	321	13,488	22,475	944,131
Other (Non-B)	8,721			
Total	11,928		70,194	992,247

4.34 Iceni note that the Combined Scenario supports 13,500 FTE jobs (rounded) just in B-class uses, and that if the other non-B-class jobs in the baseline scenario are taken into account; plus the 2,000 additional jobs at the Purfleet Centre, total FTE employment growth would at least 24,200 over the 2016-36 period. This would likely be an under-estimate, based on multiplier effects associated with the major interventions and uplifts modelled.

4.35 Iceni would also note that a 'labour demand' forecasting approach is the only approach which has been considered within the ELR. This conflicts with Government Guidance which has consistently advised that a range of forecasting approaches should be considered, including projections based on past take-up trends; and consideration of wider market signals. The 2019 PPG in Para 2a-029 states:

"It is important to consider recent employment land take up and projections (based on past trends) and forecasts (based on future scenarios) and identify occupancies where sites have been developed for specialist employment uses. This will help to provide an understanding of the underlying requirements for office, general business and warehousing sites and (when compared to the overall stock of employment sites) can form the context for appraising individual sites."

4.36 It is typical for employment land studies to consider past take-up trends alongside labour demand approaches which use econometric forecasting, and to compare the results of both and draw this together with the wider evidence/understanding developed through study preparation to inform conclusions. Indeed there is a significant degree to which econometric modelling is not necessarily suited to understanding future requirements for industrial sectors.

4.37 In the manufacturing sector, what econometric models typically show is growth in economic output but reductions in employment (as a result of productivity improvements). But whilst employment might be falling, this does not necessarily imply a declining requirement for space – a business can be growing and investing, and increasing in size, but though greater efficiencies needs less staff to operate. In our view there is likely to be a greater correlation between GVA and net floorspace requirements.

4.38 Similarly for the distribution sector, the key drivers of space requirements including growth in trade (such as the tonnage of goods transported), the particular growth in the e-commerce sector, replacement of older, outdated warehousing and a market trends towards larger unit sizes which offer greater economies of scale. Projections of past jobs trends can be a poor indicator of future floorspace requirements.

4.39 GVA's analysis of churn and losses is also based on very short-term trends, and lacks comprehensive understanding of local dynamics. Iceni note for instance that typically industrial and warehouse floorspace has a 30 year lifespan. A significant component of demand for new industrial and warehousing floospace can arise from businesses moving to larger or newer floorspace within a local market, and this has not been properly captured in the analysis. We conclude that the EDNA significantly under-estimates employment land needs.

The forecasting element of the EDNA need to be revisited. Key assumptions which have been made are not justified, and a more thorough assessment of dynamics affecting industrial/ logistics demand is needed, which addresses the following:

- Port expansion and opportunities in port-centric logistics; and the interaction between this locally-generated demand and displacement of industrial activities from London. It isn't appropriate to assume that these fully overlap;

- The degree to which the Port, land availability (in the context of constraints elsewhere) and improved strategic road accessibility support significant improvements in Thurrock's competitive advantage and allow it to capture a greater share of regional demand than it has done historically.

More thorough consideration also needs to be given to the level of churn which can arise in the local market, taking account of the typical lifespan of industrial properties. Given these factors, Iceni conclude that the EDNA significantly under-estimates industrial floorspace and land requirements in Thurrock.

5. INTERROGATING THURROCK'S ECONOMIC GROWTH POTENTIAL

5.1 Taking account of our comments regarding the EDNA, we have sought to set out in this section our assessment of local economic drivers specific to Thurrock. We use the latest baseline forecast from the EEFM Model as a starting point, appraise local economic drivers which can be expected to influence economic performance, and bring the analysis of these together to consider the implications for overall expected economic growth and employment land provision.

Key Economic Attributes

5.2 The EDNA essentially describes Thurrock's economy as a relatively sizeable one, but which could have been performing better. There are however clear opportunities for stronger performance, particularly informed by Borough's existing economic assets, things which are already happening, and the context of constraints affecting surrounding areas. Iceni's analysis suggests a particular economic growth opportunity in Thurrock which is underpinned by:

- Its location which is **close to London** – the UK capital, its economic heart and a major economic and population centre – **and on major transport arteries** – the A13 and M25 which provide access both to the Capital but are also an important route between other parts of the country and ports;

- The **growth of the borough's Ports** which will support additional creation both within the Port estate and in warehousing and logistics activities. The ports coupled with the availability of employment land (which is constrained in many other parts of London and its immediate surroundings) affords Thurrock a strong competitive advantage in attracting growth in logistics sector. There is policy support for this at a range of levels, and a **particular opportunity in port-centric logistics**, which differentiates the opportunity in Thurrock from other locations;

- **Major infrastructure investment**, which will address congestion on the strategic road network, including the short-term **improvements to the A13**, providing three lanes each way between Stanford-le-Hope and the M25; with the **prospect of delivery of the Lower Thames Crossing** in the longer-term which will improve journey times and the reliability of the Strategic Road Network. This will reinforce the Borough's strength as an industrial location and its broader economic attractiveness. We would expect that the completion of improvements to the A13 will provide a spur to take up of employment land around Stanford-le-Hope;

- **Labour availability**, which will be influenced by housing growth within the Borough itself, and the Borough's accessibility, which afford access to a wide labour pool extending to other parts of Essex, East London and North Kent.

5.3 This provides a very strong foundation for economic growth; with the improvements in infrastructure and growth of the Ports explaining clearly why it is reasonable for stronger growth to be achieved looking forwards than has occurred historically.

5.4 The Borough is already an established market for industrial premises, with 1.1 million sq.m of industrial space. There is a strong supply of employment land, in contrast to the situation in many parts of the region and other locations close to London (influenced by land values and Green Belt constraints in particular). Coupled with the above, there is a major growth opportunity for the Borough's economy.

Baseline Forecasts

5.5 To consider and assess economic growth potential we have used the latest iterations of the East of England Forecasting Model (EEFM) as a starting point. This is the 2017 forecast run.

5.6 We have taken EEFMs outputs both on employment (jobs) as a starting point. We have then sought to test the degree to which local economic drivers would warrant adjustments to the baseline forecasts (much as GVA did in the EDNA).

5.7 The Technical Report accompanying the forecasts is clear that they are based on observed past trends only; and take account of local data on employment trends to 2015 only. This is important and means that what has been happening in recent years, including in areas such as port expansion, is not captured within the EEFM forecasts.

5.8 The 2017 EEFM baseline expects employment growth of 10,100 jobs over the 2018-38 plan period. This equates to 0.6% pa growth in employment per annum, which whilst modestly above that forecast at a regional or national level, is half the rate at which Thurrock's economy has historically grown and a third below historical trends at a regional level.

Table 5.1 EEFM 2017 Baseline Forecasts

	Employment		GVA	
CAGR	2001-15	2018-38	2001-15	2018-38
Thurrock	1.2%	0.6%	1.2%	1.5%
Essex	0.7%	0.4%	1.3%	1.5%
East of England	0.9%	0.5%	1.4%	1.5%
UK	0.8%	0.4%	1.4%	1.5%

Source: East of England Forecasting Model, InsightEast

5.9 Whilst employment growth is expected to be above that expected across wider geographies, GVA growth is consistent to that forecast pointing to lower productivity performance in the baseline forecasts.

5.10 The table below shows the distribution of employment growth by sector (2018-28). In the baseline forecasts, manufacturing employment is expected to decline; with construction, retail and health sectors expected to see the largest employment growth.

Table 5.2 Employment Growth by Sector in Thurrock – EEFM 2017 Baseline

	2018 Employ-ment ('000s)	2038 Employ-ment ('000s)	2018-38 Change	2018-38 CAGR
Agriculture	0.22	0.19	0.0	-0.7%
Mining & quarrying	0.00	0.00	0.0	-5.8%
Manufacturing – food	0.46	0.32	-0.1	-1.9%
Manufacturing - general	0.76	0.58	-0.2	-1.3%
Manufacturing - chemicals only	0.97	0.54	-0.4	-2.9%
Manufacturing - pharmaceuticals	0.00	0.00	0.0	-
Manufacturing – metals	0.30	0.24	-0.1	-1.1%
Manufacturing - transport equipment	0.20	0.14	-0.1	-1.8%
Manufacturing - electronics	0.04	0.03	0.0	-2.0%
Manufacturing Total	2.73	1.85	-0.9	-1.9%
Utilities	0.31	0.31	0.0	0.0%
Waste & remediation	1.25	1.65	0.4	1.4%
Construction	6.00	8.34	2.3	1.7%
Wholesale	6.26	6.38	0.1	0.1%
Retail	13.48	15.66	2.2	0.8%
Land transport	11.71	11.95	0.2	0.1%
Water & air transport	0.09	0.10	0.0	0.7%
Accommodation & food services	4.69	5.63	0.9	0.9%
Publishing & broadcasting	0.16	0.15	0.0	-0.4%
Telecoms	0.18	0.16	0.0	-0.5%
Computer related activity	0.69	0.82	0.1	0.9%
Finance	0.51	0.45	-0.1	-0.7%
Real estate	0.76	0.81	0.0	0.3%
Professional services	3.07	3.87	0.8	1.2%
Research & development	0.01	0.01	0.0	0.4%
Business services	5.03	5.37	0.3	0.3%
Employment activities	2.11	2.39	0.3	0.6%
Public administration	1.34	1.58	0.2	0.8%
Education	5.95	6.63	0.7	0.5%
Health & care	6.50	8.55	2.1	1.4%
Arts & entertainment	0.97	1.13	0.2	0.8%
Other services	1.53	1.64	0.1	0.4%

Source: EEFM

5.11 Wholesale and land transport – key sectors which relate to logistics/distribution activities are expected to see very modest growth (in the 100s of jobs over 20 years). No growth in water transport (in which port-related activities would fall) is anticipated.

5.12 Overall the forecasts do not relate well to an understanding of how Thurrock's economy can be expected to perform. On the basis of the key factors and new infrastructure underpinning the Borough's growth potential (as described above), **the baseline forecast is not a credible assessment of future performance.**

Interrogating Future Economic Growth Potential

5.13 To aid the development of the Local Plan, Iceni has sought to move on in this section to consider locally-specific economic drivers and opportunities which can be expected to influence the Borough's economic growth potential.

5.14 In coming to a view on how the Borough's economy is expected to perform over the plan period, econometric forecasts should be used as a tool to aid understanding alongside a close and careful interrogation of local economic drivers. The overarching approach adopted in GVA in the EDNA in this respect was appropriate, but Iceni consider that insufficient in-depth consideration was given to local economic drivers and the implications that these might have on employment growth and employment floorspace and land needs.

5.15 Iceni consider that consideration in particular needs to be given as part of the further work to be done by the Council in considering future economic performance to the following:

- Port expansion – through the growth of London Gateway and delivery of Tilbury 2;
- Growth in B8 logistics development associated with Port-centric logistics;
- Wider manufacturing and distribution development arising from displacement from London;
- Expansion of Lakeside regional shopping centre;
- Town centre regeneration in Grays;
- Potential delivery of the Lower Thames Crossing.

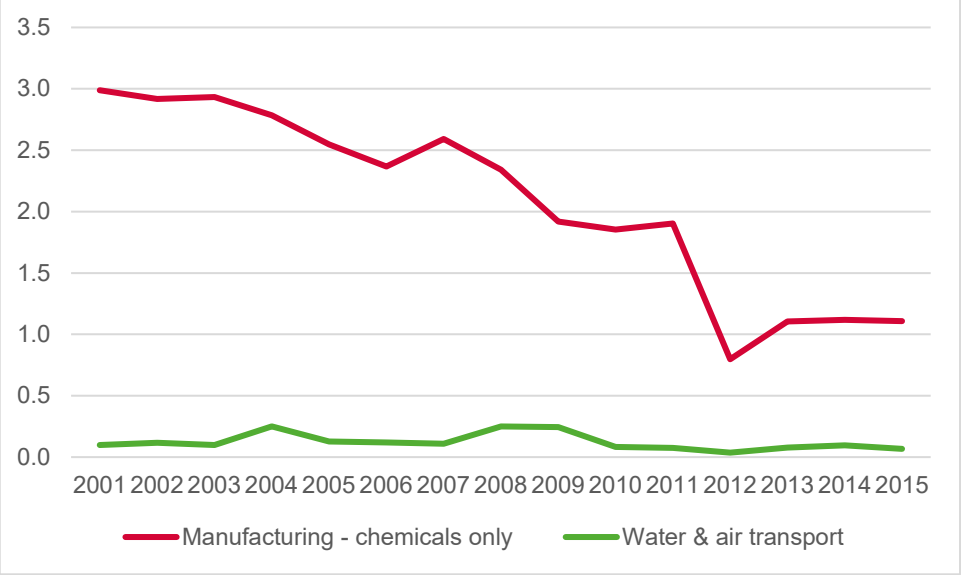
5.16 We consider each of these below. These are known factors which can be expected to influence future economic performance and employment land needs in the Borough, the effects of which can be considered and appraised based on existing information.

5.17 These primary growth drivers, together with major infrastructure investment which is expected to be delivered, can then be expected to support additional employment through the boost they provide to the construction sector and through multiplier effects (in respect of the boost they generate in local spending on shops, services and facilities and through local supply chains).

Port Expansion

5.18 The chart below shows historical trends in employment in three sectors: chemical manufacturing; water and air transport; and land transport, as shown in EEFM 2017, based on Business Register and Employment Survey data. It shows a downward trend in chemical manufacturing, and very modest employment (c.100 jobs) in water and air transport. The decline in the chemicals sector may have been influenced by the closure of the Shell Haven and Coryton oil refineries historically.

Table 5.3 Historical Employment trends in Port-related Activities



5.19 Over the 2018-38 period, EEFM 2017 projects a further loss of a further 400 jobs in chemical manufacturing, influenced by the historical trend; and projects no growth in water and air transport. Local evidence however points to employment growth in both sectors. 2,300 additional jobs are expected in the construction sector in the EEFM baseline.

5.20 The expansion of the Port of Tilbury received Development Consent in February 2019. Tilbury 2 will deliver a new roll-on, roll-off terminal, a construction materials and aggregates terminal and support storage of bulk goods and vehicles. It will be the country's biggest construction materials processing hub, supporting the construction sector at a regional level.

5.21 The PIER Report supporting the Development Consent Order (DCO) application considered the economic impact of the project. It identified the current economic contribution of the Port as 649 FTE employees with tenant/operator employment of around 3,010 FTE giving total current employment

of c. 3,750 FTE jobs. This clearly shows that the EEFM model already under-estimates the size of the water and air transport sector. It sets out that expansion (through the delivery of Tilbury 2) will support gross direct employment of 131 FTEs, with total net additional employment of 138 FTEs. Additional total construction employment in Thurrock is calculated as 57 FTEs.

5.22 In addition, Thurrock is home to London Gateway – a major new container port for the region. There are two elements to this: the Port itself, and the Logistics Park. The new Port will have capacity for 3.5 million TEUs with the ability to accommodate ultra-large container ships, and is expected to employ 1,600 workers (Logistics Park TA Para 5.3.28). As the Port has been part-built, with 3 of 6 births operational, we have assumed that 40% of the jobs have been delivered to date; with 60% due to be delivered plus the Ro-Ro terminal. On this basis, the further growth of the Port is expected to create a further 960 jobs plus the Ro-Ro terminal (which is expected to employ 315 workers).

5.23 In addition to this, the Thames Oilport is being delivered by a joint venture between Greenenergy and Shell on part of the site of the former Coryton Oil Refinery. This supports the bulk import of oil and fuel blending. Diesel storage began in 2016, with road loading of diesel and heated oil in April 2017 and further growth to store and supply petrol is planned. This will also deliver additional jobs in chemical manufacturing.

5.24 On the basis of the above, we have assumed that 1,400 additional jobs are delivered in Port-based activities phased over the period to 2025 resulting from the additional direct jobs expected to be generated by the expansion of the two ports. There is additional potential adjustments which could be made to chemical manufacturing employment and the construction sector, which the Council should investigate in the development of its evidence base.

Industrial Space (including Warehousing and Logistics)

5.25 The EDNA clearly identifies a sector strength in logistics in Thurrock identifying it as an existing sector specialism and one which is expected to grow, and indeed to drive demand for employment land in the Borough. This is underpinned by the borough's strategic location, close to London (a major market for goods), with major transport arteries (M25 and A13) running through it, and with major deep sea container ports within the Borough (Tilbury and London Gateway). There are few areas which have these assets, together with a supply of available land to support warehousing and logistics growth, and set in a context of a constrained supply of land in many areas close to London they clearly indicate that Thurrock can has a comparative advantage, can be expected to capture a large share of regional growth and can expect significant growth in this sector.

5.26 The Council has not published up-to-date monitoring data on employment floorspace take-up. We have therefore relied on the EDNA which identifies annual take-up of 76,000 sq.m per annum over the last five years (EDNA Para 8.128). If this historic take-up is projected forwards over the 20 year

plan period (2018-38) it results in a need for 1,520,000 sq.m of B8 floorspace. This is a helpful initial benchmark of potential demand and would require 380 ha of land at a 40% plot ratio.

5.27 The latest evidence on industrial land demand and displacement from London is set out in the *London Industrial Land Demand Study* (CAG Consultants, June 2017). Section 7 in that report deals with warehousing and logistics. It outlines that with London's population and economy growing, there is a growing demand for goods that need servicing, but suggests that an increasing proportion of demand for warehousing and logistics space has been met outside of the capital.

5.28 The report found that the largest cluster of distribution centres within London was in East London, particularly close to the A13 Corridor, and beyond London, the largest concentration was in South Essex and North Kent around the Dartford Crossing, close to the M25, M2 and M20 which provide access to both London and the Channel Ports.

5.29 The report forecasts future requirements within London based on the (pre-recession) 1998-2008 trend. This results in a net need for 1,608,400 sq.m across London and a land requirement of 280 ha. A substantial proportion of this requirement is in the Thames Gateway sub-region in which a need for 992,500 sq.m of warehouse space is forecast (153 ha of land). The report is clear that this forecast itself a proportion of London's logistics needs are met outside of London, in line with past trends. It sets out that "*the area to the east of London both north and south of the river may be best placed to accommodate activity that is being displaced from London due to pressures on space."* Thurrock is one of just 13 authorities which is identified (Table 7.4) as having the greatest potential to provide for substitution of demand from London.

5.30 There is essentially no land on which to accommodate *additional* distribution floorspace needs within East London, with Table 13.1 in the Study pointing to a planned release of 412 ha of industrial land in the East London; and 317.7 ha release from those boroughs in the Thames Gateway PMA. Of this the greatest expected releases are from Barking and Dagenham and Newham which sit on the A13 Corridor and together expect releases of 195 ha.

5.31 The EDNA modelled that over a 20 year period, 40% of businesses displaced due to redevelopment of industrial land in the Thames Gateway PMA (TGPMA) could be accommodated in Thurrock. Planned industrial land losses in the TGPMA within London are estimated based on the latest evidence as 317.7 ha. 40% of this would equate to 127 ha of land, which is notably higher than the 93 ha modelled in the EDNA. This may well under-estimate the volume of displacement in particular due to plans by Barking & Dagenham Council for the re-designation and mixed-use redevelopment of Strategic Industrial Location (SIL) sites in the Borough.

5.32 This issue could alternatively be considered having regard to the Spatial Substitution Scenario modelled in the *London Industrial Land Demand Study*. In this scenario, all of London's net additional

demand for warehouse floorspace was assumed to be met outside London. For the Thames Gateway PMA, this scenario forecast demand for 152,000 sq.m of warehouse floorspace compared to 992,500 sq.m in the Baseline Scenario. Displaced demand for warehouse floorspace was therefore 840,000 sq.m. With a 40% plot ratio this would require around 210 ha of land. Accommodating 40% of this in Thurrock would equate to 84 ha of land. But this relates just to distribution space; and does not capture manufacturing/ industrial relocations.

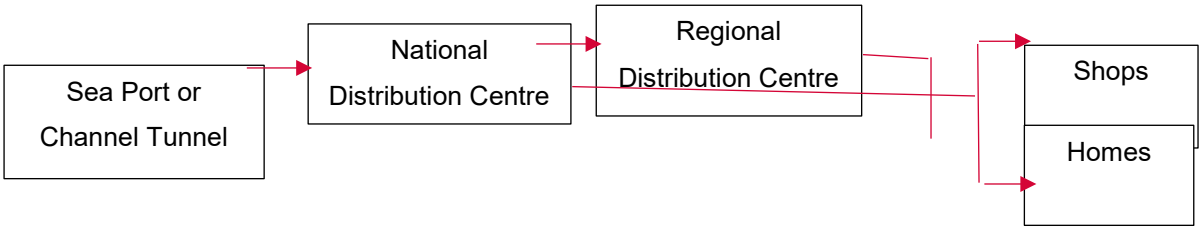
5.33 On the basis of the above, we consider it reasonable to estimate a need for 120 – 130 ha of industrial land (capable of accommodating B1c, B2 and B8 uses) to accommodate displacement of industrial and warehouse activities from London to Thurrock. This is over the 2016-41 period which is longer than the plan period for Thurrock's Local Plan. Using the midpoint from this range, a pro-rata adjustment would yield displacement of c.100 ha of industrial land which (given available land supply) could be expected to be accommodated in Thurrock.

5.34 If we adopt consistent assumptions on plot ratios and employment densities to the EDNA, this would accommodate 400,000 sq.m of industrial floorspace. A 70/30 split between warehouse and industrial space as per the EDNA would result in growth of 280,000 sq.m of warehouse floorspace and 120,000 sq.m of industrial floorspace. As a minimum it would be appropriate to add the industrial (manufacturing) space to the initial baseline assessment of warehouse demand; and we would recommend that the Council gives further consideration to the interplay between industrial needs arising from local demand and those displaced from London.

5.35 Consideration thirdly then needs to be given to port-related logistics. Most goods imported/exported to the UK deep sea ports have traditionally gone through Felixtowe or Southampton. The growth of the ports in Thurrock – London Gateway and Tilbury – can be expected to have a major in shifting distribution network at a national level. This affects the geography of networks and thus the geography of demand for floorspace. This can be expected to support demand for logistics space in locations to the east of London in in particular in Thurrock, close to the Ports.

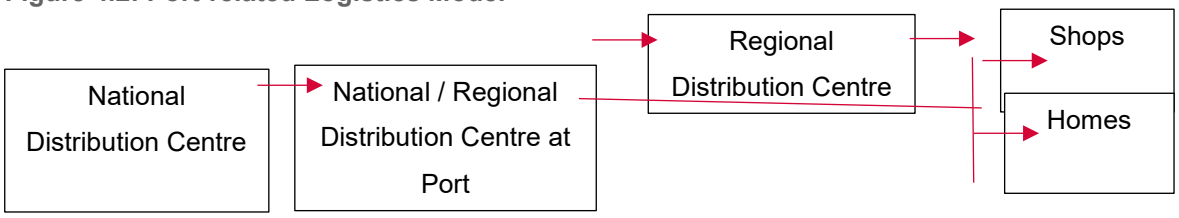
5.36 A typical logistics model has seen goods distributed from major container ports such as Felixtowe to a National Distribution Centre (NDC), which has typically been in the Midlands, with goods then distributed on to a Regional Distribution Centre (RDC) and direct to jobs and homes.

Figure 4.1: Traditional Logistics Distribution Model



5.37 A port-related logistics model has significant potential to reduce vehicle miles, through co-locating the National Distribution Centre with the Port. Goods can then be distributed on from the NDC to RDCs and also direct to shops and homes. Given that London and the South East is a major UK market for goods and services, there are significant sustainability benefits in terms of reducing vehicle miles/ travel distances, from warehousing which is located in or close to South East ports from which goods can then be distributed direct to shops and homes across the region. This opportunity to support port-related logistics is essentially unique to Thurrock and supports particular competitive advantage in the sector.

Figure 4.2: Port-related Logistics Model



5.38 As set out in the Transport Assessment underpinning the London Gateway Logistics Park Local Development Order Application, the London Gateway Port has the potential to 3.5 million TEUs (twenty-foot equivalent units) per annum. The TA assumed 16.6% of these would go to the Logistics Park (580,180 TEU), with 700,000 TEU transhipped and 2.2 million TEUs going to other inland destinations by road/rail. On this basis, and as the TA sets out, 76% of the capacity of the Logistics Park's floorspace (i.e. 630,570 sq.m of 829,700 sq.m max total capacity) is specifically meeting port-related logistics demand.

5.39 It would be reasonable to apply a similar calculation to expansion of Tilbury (Tilbury 2) in assessing what can be ascribed to port-related logistics. On the basis of the Preliminary Environmental Information Report (Volume 1), as submitted with the DCO application, port trade volumes are expected to increase from 13.5 million to 18.6 million (an increase of 5.1 million). Adopting consistent assumptions to the above, Iceni estimate that this would support demand for at least 54,000 sq.m of additional port-centric logistics space.

5.40 Iceni estimate a need for 685,000 sq.m of port-related logistics/distribution space which is specifically associated with growth of the Ports which has essentially not been considered in the EDNA. With a plot ratio of 0.4, this would require 171 ha of land. This is in additional to the base floorspace requirement of 1,520,000 sq.m of B8 floorspace based on past take-up, giving a **total locally-generated need for 2,205,000 sq.m B8 floorspace**. With a standard plot ratio of 0.4, this (overall) would equate to a base need for 551 ha of B8 space within Thurrock.

Table 5.4 Thurrock-specific Need for B8 Logistics Floorspace

	Floorspace (sq.m)	Land (Ha)

Base Assessment of Need	1,520,000	380
Port-related Logistics	698,000	171
Total	2,205,000	551

5.41 In assessing the employment associated with this, we have taken into account that whilst new-build space will support employment, that some older warehouse floorspace might be redeveloped over time. Given that warehouses typically have a 30 year lifespan it is reasonable to expect replacement of around 800,000 sq.m of floorspace (two-thirds of existing) over the 20 year plan period. Additional job creation would therefore arise from 1.4 million sq.m of space over the plan period.

5.42 We have assumed on this basis growth in employment in warehouse/logistics activities, both port and non-port related, of 20,100 jobs. The wholesale, retail and land transport sectors see growth of 2,500 jobs in the 2017 EEFM Baseline forecasts. We have therefore assumed that growth in this sector – which is a major growth driver in the Borough – supports an additional 17,600 jobs in addition to those in the baseline. In addition, manufacturing employment growth of 2,400 in net terms (taking account of reductions in the EEFM Baseline) is assumed. We have phased these over the course of the plan period to 2038.

Table 5.5 Estimated Job Creation in Warehouse/ Logistics Activities

	Floorspace (sq.m)
Assumed Net Growth in Space	1,405,000
Employment Density (as per EDNA) – sq.m per FTE	70
Growth in Warehouse/Logistics Jobs	20,071

Growth in Retail, Leisure and Town Centres

5.43 Capital Shopping Centres have planning consent for the expansion of Lakeside Shopping Centre, which will deliver up to 40,700 sq.m[5] of additional retail space. The assessment of economic impacts which supported the planning application anticipated than on completion the scheme would support 3,340 jobs of which 2,590 jobs would be net additional jobs to those in the region.[6] This could be expected to support additional above-trend employment growth in the local economy. It would however not affect B-class floorspace/land requirements.

[5] Net additional retail area

[6] Based on NLP Environmental Statement supporting Application 11/50433. We have excluded indirect jobs supported by additional spending and in the supply chain, which number 800 additional.

5.44 We have counted retail jobs in the EEFM baseline as part of warehousing space above. But EEFM also forecasts 900 jobs in leisure activities (accommodation and food). Our assumption in therefore that Lakeside Expansion would support additional employment generation of 1,700 over that in the EEFM baseline phased over the period to 2024.

5.45 Furthermore the Council is progressing a programme of town centre regeneration in Grays, with the intention of delivering improved public realm and connectivity; an improved cultural/ leisure offer; further education hub and new housing. Similarly regeneration of Purfleet Town Centre is moving forwards with a new town centre, medical centre, primary school, transport interchange, public realm improvements and new housing expected. These major town centre regeneration schemes have the potential to support additional job creation. At this stage we have not made specific quantitative provision for additional employment growth at Grays and Purfleet. We recommend that the Council consider the impacts of this on Borough economic performance further.

Lower Thames Crossing

5.46 The proposed Lower Thames Crossing is intended to improve capacity and increase resilience of the strategic highways network on both sides of the Thames.

5.47 The Summary Business Case developed by Highways England[7] estimate £3.8 billion in direct economic benefits arising from its delivery, the majority of which arise from its effects in supporting business investment. In addition, a further £1.7 million in wider economic benefits are expected to arise including as a result of agglomeration and labour market impacts. Within this, Basildon, Brentwood and Thurrock are expected to see the highest GDP impacts.

5.48 Iceni has not sought to estimate specific impacts arising for Thurrock given the information available at the current time; but note that the delivery of the LTC will increase the attractiveness of Thurrock for a range of businesses, including industrial and warehousing/ logistics businesses.

Construction Sector

5.49 The scale of investment implied by the above will support significant growth in construction sector employment in the Borough.

5.50 Construction employment in the baseline is expected to grow by 1.7% pa which compares to 0.8% growth per annum expected at the regional level. We have made a modest upward adjustment to

[7] https://highwaysengland.citizenspace.com/ltc/lower-thames-crossing-consultation/user_uploads/lower-thames-crossing-consultation-summary-business-case.pdf

the growth rate to assume 2.0% pa growth. This results in an additional 570 jobs in addition to those in the Baseline. This represents a cautious assessment of growth potential in the sector.

Multiplier Effects

5.51 The scale of additional jobs created by the above major economic drivers can additionally be expected to support growth in jobs through local spending and supply chain development. Growth of 3,000 jobs is expected in health, education, arts and entertainment and other services in the EEFM Baseline Forecasts. We have taken a cautious approach and have not applied any further adjustments to employment growth in these, or the retail sector. This is however an issue which the Council should consider further.

Bringing the Evidence Together

5.52 Bringing the evidence together, our analysis points to an expected economic growth of at least 33,800 jobs in Thurrock over the 2018-38 period. The adjustments shown to the baseline forecast are indicated in the table below.

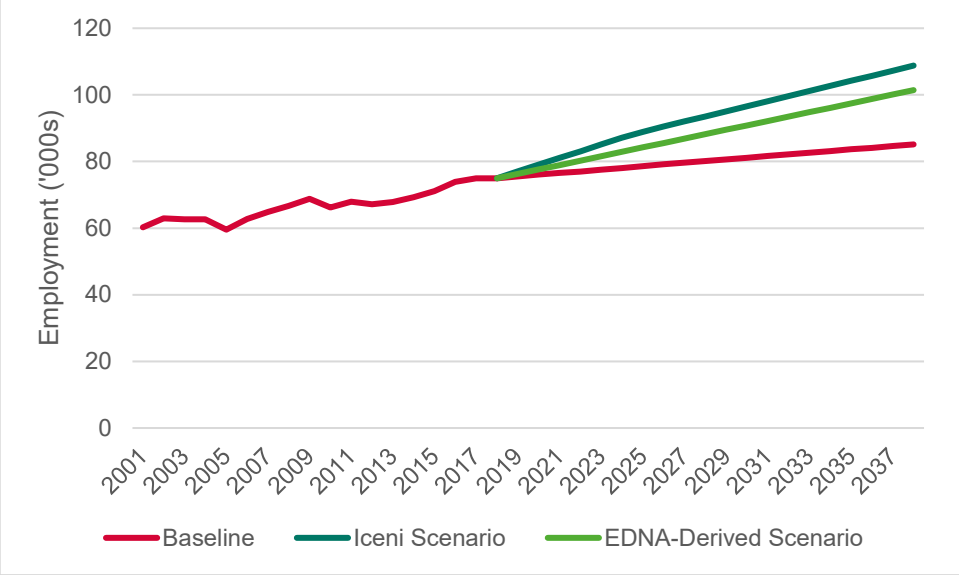
5.53 For comparison purposes, this compares to employment growth of around 26,500 jobs assumed in the EDNA figures (2018-38) and to 24,500 jobs referred to in the Issues and Options Consultation document (2018-37).

Table 5.6 Iceni Assessment of Expected Economic Growth in Thurrock

	Employment Growth - Thurrock, 2018-38
Baseline Growth – EEFM 2017	10,160
Iceni Scenario Adjustments	
Port	1400
Warehouse/Logistics	17,600
Manufacturing	2,400
Lakeside Expansion	1,700
Construction	570
Total Jobs – Iceni Scenario	33,830
EDNA-Derived Scenario	26,455

5.54 Our assessment would see 1.9% pa growth in employment. Whilst this is above the 1.2% pa growth achieved in Thurrock over the 2001-15 period, this period was affected by a sustained period of economic recession and low growth; and above analysis indicates key, locally-specific economic drivers which mean that it is entirely reasonable to expect above-trend growth in Borough over the plan period.

Figure 4.1: Scenarios for Employment Growth in Thurrock



5.55 Bringing together our analysis of employment land needs (and particularly needs for industrial land), Iceni finds employment land needs have been substantially under-estimated in the EDNA. Our own assessment, drawing on more in-depth analysis of industrial land demand drivers and in some instances more recent information, points to a base need for at least 2.4 million sq.m of B-class employment floorspace and 584 ha of land to 2038.

Table 5.7 Iceni Assessment of Employment Land Needs, 2018-38

	Floorspace (sq.m)	Land (ha)
Office (B1a/b)	30,137	3
Industrial (B1c/B2)	120,000	30
Warehouse (B8)	2,200,000	551
Total	2,350,137	584

5.56 As identified above, further consideration needs to be given by the Council to what allowance for additional non-B-class uses (including waste, recycling, car showrooms, transport etc.) might be expected to take place on employment sites. The Council also needs to consider what level of supply-side contingency is needed to allow for losses to other uses, and to provide an adequate choice of sites to cater for market demand.

Wider Commercial and Economic Opportunities

5.57 There will be wider economic growth opportunities which arise in different parts of the Borough from the Local Plan strategy which the Council will need to consider and appraise through the plan-making process.

5.58 This includes the economic benefits which could arise from the delivery of a new rail station at Corringham as part of strategic development of Land at North East Corringham, which could support additional investment in the local economy in the settlement and improve public transport accessibility to London Gateway and Thames Enterprise Park through bus rapid transit.

5.59 At West Horndon there are also potential economic growth opportunities which could be realised alongside strategic growth including the potential for data centres. There is a growing market for data centres on accessible sites with a low risk profile which have an adequate power supply, high quality broadband connections and which are close to London and to the financial centres of the City of London and Canary Wharf. With increasing use of technology, including cloud data storage, and the potential growth of autonomous vehicles (driverless cars) this is a potential major growth sector, and one where Thurrock could capture investment.

6. IMPLICATIONS FOR HOUSING NEED

6.1 In this section, we have sought to consider the implications of our analysis and conclusions on expected employment growth in Thurrock on housing need. Our approach has been to adopt essentially consistent assumptions where appropriate to those made by Turley/Edge Analytics.

6.2 Our core modelling assumptions are set out below:

Table 6.1 Iceni Core Modelling Assumptions

Topic	Assumption
Base Population Projections	2014-based Sub-National Population Projections (consistent with current PPG Guidance and SHMA Addendum)
Household Formation Rates	2014-based Household Projections (as per PPG), with adjustments made to 15-24 and 25-34 age groups returning to 2001 levels by 2024 (consistent to SHMA Addendum). We have used the Stage 1 outputs.
Vacancy Rate	2.4% based on 2011 Census (consistent to SHMA Addendum)
Unemployment	Reducing unemployment from 4.5% in 2018 by 0.1pp to 4.4% in 2020 (as per the SHMA Addendum)
Economic Activity Rate	Applying Summer 2018 Office for Budget Responsibility (OBR) economic activity rate changes to 2011 Census position by age/sex for Thurrock
Double Jobbing	2.6% double jobbing rate based on APS data (2004-18) (consistent to SHMA Addendum)
Commuting	Commuting ratio of 1.21 based on 2011 Census which is held constant (as per SHMA Addendum)

6.3 On this basis we have first of all sought to calculate the level of employment which provision of housing in line with the standard method would support. This takes the 2014-based Population and Household Projections as a starting point; makes the adjustments to household formation as shown above and includes an allowance for vacant homes. Migration is then adjusted to support the level of housing implied by the standard method (1169 dpa).

Table 6.2 Population Growth implied by Standard Method

	Population 2018	Population 2038	Change in population	% change
2014-based SNPP	170,650	205,996	35,347	20.7%
Standard Method	172,348	216,812	44,463	25.8%

6.4 Migration is then adjusted to support employment growth in line with the scenarios shown in Figure 4.1 and Table 4.6. The increases in economically active residents assumed are shown below.

Table 6.3 Growth in Economically-Active Residents in Economic Scenarios

	Additional jobs (2018-38)	Adjustment for commuting	Adjustment for double jobbing
EEFM Baseline	10,161	12,295	11,981
EDNA-Derived Scenario	26,455	32,011	31,194
Iceni Scenario	33,831	40,936	39,891

6.5 Taking the latest assumptions on economic participation from the 2018 Office for Budget Responsibility Fiscal Sustainability Report, Iceni finds that 32% population growth would be needed to 2038 to support the EDNA Scenario for economic growth; but that 41% population growth would be required to support growth in line with our findings on expected employment growth in Thurrock.

Table 6.4 Projected population change associated with different job forecasts

	Population 2018	Population 2038	Change in population	% change
Baseline	172,348	194,103	21,755	12.6%
EDNA-Derived Scenario	172,348	227,763	55,414	32.2%
Iceni Scenario	172,348	242,999	70,650	41.0%

6.6 Applying household formation assumptions from the 2014-based Household Projections, but adjusting household formation rates for younger age groups as the SHMA itself did, we find that 27,620 homes (1381 dpa) would be needed to support the EDNA-derived Scenario over the 2018-38 plan period; but that to support our assessment of expected employment growth in the Borough would require provision of 33,500 homes (1677 dpa).

Table 6.5 Economic-led Scenarios for Housing Need in Thurrock

	Households 2018	Households 2038	Change in households	Per annum	Dwellings per annum
Baseline	68,162	82,396	14,234	712	729
EDNA-Derived Scenario	68,162	95,140	26,978	1,349	1,381
Iceni Scenario	68,162	100,909	32,747	1,637	1,677

Appendix 3
ISA Review

Thurrock Local Plan

Integrated Sustainability Appraisal of the Thurrock Local Plan: Issues and Options

Iceni Projects Limited on behalf of Cogent Land LLP

March 2019

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MARCH 2019
Thurrock Local Plan
INTEGRATED SUSTAINABILITY APPRAISAL OF THE THURROCK LOCAL PLAN: ISSUES AND OPTIONS (STAGE 2)
Thurrock Local Plan
INTEGRATED SUSTAINABILITY APPRAISAL OF THE THURROCK LOCAL PLAN: ISSUES AND OPTIONS (STAGE 2)
LIMITED
COGENT
LAND

CONTENTS

1. INTRODUCTION

1.1 This document has been prepared by Iceni Proje
(Cogent) in relation to the Integrated Sustainabil
and Options (Stage 2) Review, which was published in 2011
Thurrock Council is preparing a new Local Plan th
development across the Borough in the period up to
new Local Plan, in order to identify how sustainab

1.2 Cogent have an interest in land at East Tilbury
Plan to promote their Site in helping achieve the

1.3 The purpose of this review is to determine whet
been based on an adequate process and to identify
compliance of the ISA and the soundness of the Lo
requirements for Health Impact Assessment (HIA) a
review is in relation to the SA/SEA elements.

Background

1.4 East Tilbury is a settlement located to the sout
settlement created by the Bata Shoe Company in th
primary school; several doctorsô surgeries; conven
of open space. Cogent have an interest in land a
landowners and local stakeholders to bring forwar
mix of uses including housing, road infrastructur
well as employment uses. Further land in their po
location of up to at least 3,000 dwellings and ass

Compliance and the Requirement for SA to be Undert

1.5 Sustainability Appraisal (SA) is a statutory r
Purchase Act 2004[1]. The SA process is underpinned by the
Environmental Assessment Directive (SEA)[2] which is the EU Development
legal requirements for SEA are set out in the Envi

[1] Section 19(4)

[2] 2001/42/EC

Regulations 2004 (the óSEA Regulationsô) which tra
effects of certain plans and programmes on the env
law.

1.6 Although SEA and SA are separate processes, the
on the likely environmental effects of a plan whi
extending to social and economic impacts. The NPPG
that:

ïSustainability appraisal should meet all of the r
Plans and Programmes é ó Regulations 2004 ô. Sustainability appraisal
preparation and development of a Local Plan, to i
addressed[3]

1.7 Therefore, SA/SEA is a procedural requirement o

1.8 As part of the SA Scoping process, elements of
integrated into the ISA instead of the provision o

- Health Impact Assessment (HIA);
- Equalities Impact Assessment (EqIA); and
- Habitats Regulations Assessment (HRA) ï once a p
will be completed, however there is insufficient
separately.

1.9 The SA/SEA of the Thurrock Local Plan is being
referred to throughout this document as the ISA.

1.10 This report is structured as follows:

- Section 2: Review of the ISA Process to Date;

[3] NPPG Paragraph: 007 Reference ID: 11-007-20140306

[4] NPPG Paragraph: 006 Reference ID: 11-006-20140306

- Section 3: Review of the ISA for the Thurrock L
- Section 4: Summary and Recommendations.

1.11 Appendix A provides an amended version of the SA Frame

2. REVIEW OF THE ISA PROCESS TO DATE

2.1 SA/SEA is an iterative process that takes place
of 5 stages:

1. Stage 1 / A: Setting the context and objecti
scope - resulting in a Scoping Report;

2. Stage 2 / B: Developing and refining options
Issues and Options Interim SA Report;

3. Stage 3 / C: Prepare the Sustainability Appr

4. Stage 4 / D: Consult on the draft SA Report a
to the SA Report; and

5. Stage 5 / E: Adoption and Monitoring - adopt

2.2 The ISA for the Thurrock Local Plan (December 20
this ISA is a high-level assessment of the develop

2.3 In February 2016 the Council published an Issue
document. This was accompanied by a draft of the I
scope of the SA and provided an overview of the
development process. This was published for public
26th February April 12016.

2.4 Prior to the publication of the draft ISA Scopi
sustainability issues for Thurrock was undertaken

- Flood risk and air quality;
- Strategic planning, cross-boundary planning and
- Childrenôs care;
- Heritage, footpaths;
- Landscape, ecology and open spaces;

- Transport development; and
- Housing.

2.5 The Environment Agency, Natural England and Hist
under the SEA Regulations and were issued the ISA
during the six-week consultation period were consi
ISA. These are summarised in Appendix 1 of the ISA

2.6 The Scoping Report is fundamental to the ISA in
assessment of effects. It identifies:

- Relevant plans, policies and programmes;
- Baseline information, evidence and sustainabili
- The SA Framework and methodology and use of si
  Regulations, including secondary, cumulative and

2.7 The SA Scoping Report states that the SA must b
information on the current and future state of the
influence the plan-making process.

2.8 The SA Scoping Report was prepared in February
within the borough at the time of writing. Howeve
change, and is likely to continue to do so throug
reflected in the evidence base, including the S
assessments are undertaken to support the Local Pl
technical assessment on the social, economic and e
updated regularly throughout the Local Plan develo
Local Plan evidence base include (but are not limi

- Green Belt Assessment (Stages 1a and 1b) (Janu
- Thurrock Level 1 Strategic Flood Risk Assessmen
- Gypsy, Traveller and Travelling Showpeople Repo
- Thurrock Employment Land Availability Assessmen
- South Essex Economic Development Needs Assessme
- Thurrock Housing Land Availability Assessment (

- South Essex Strategic Housing Market Assessment

2.9 The construction and operation of the Lower Tha effect on transport and air quality within the bo impacts of this are provided within the SA or the does not draw on supporting information to justify implying the evidence base is insufficient at this

2.10 Consequently, the SA Scoping Report should be u process, alongside the SA itself, to ensure that sufficient to provide a robust and comprehensive This should also consider additional surveys and conclusions of the SA, including in relation to a LTC.

2.11 Section 6.3.5 of the SA Scoping Report sets out locations identified in the Local Plan. We are c consistently within the ISA.

2.12 As set out in national guidance, the role of SA the extent to which the emerging plan, when judge achieve relevant environmental, economic and soci consider ways by which the plan can contribute t economic conditions, as well as a means of identif that the plan might otherwise have. By doing so, i are the most appropriate given the reasonable alt underpinning the plan and help to demonstrate how

2.13 Sustainability appraisal should be applied as a Local Plan. This review highlights where we disagr and provides an alternative scoring which should b preferred options.

3. REVIEW OF THE ISA FOR THE THURROCK

Strategic Objectives of the Thurrock Local Plan

3.1 The Local Plan Issues and Options (Stage 2) co
objectives for the Thurrock Local Plan which have
Framework and summarised in Table 4.3 of the ISA R
identified in relation to the SA topic areas, incl

3.2 Each of the draft strategic objectives focuses o
for each. No negative effects in relation to the d
showing that these present a comprehensive set of
Thurrock Local Plan from sustainability perspectiv

3.3 There are a small number of uncertainties associ
likely that these could be addressed through the
stage of the Local Plan process a preferred optio
assessment of these policies within the SA canno
identified at the next stage of the Local Plan pro
SA can be undertaken to determine the impacts of t

SA Framework and Objectives for Housing Growth

3.4 Table 2.2 of the ISA sets out the SA Framework and Obje
Plan will be assessed. These have been developed
consultees during the Issues and Options (Stage 1)

3.5 Paragraph 2.10 of the SA Framework states that *SA findings are not the only when determining a preferred option to take forwar of positive or negative effects identified for ea based on sustainability performance in order to s opinion, deliverability and conformity with natio makers when selecting preferred options for their*

3.6 In carrying out the appraisal of the development a
framework, the likely effects of the options are
judgments in most cases. Therefore, the ISA scores, which they are based o
in agreement with the ISA scores, there are a numb
out our alternative assessment at Appendix A1 of t

3.7 SA is an iterative process which means, the ass be refined to include the consultation responses advanced.

3.8 It is understood that as the Local Plan is at alternatives is high level and further assessment Appendix A 1 and the assessment and provides an alter

3.9 In line with the Councilôs methodology and scor been used to demonstrate how the settlement option SA Objectives.

Table 3.1 Key to Symbols and Colour Coding Used i

++	The option is likely to have a **significant positive** effect in relation to achievement of the SA objective(s).
+	The option is likely to have a **minor positive** effect in relation to achievement of the SA objective(s).
0	The option is likely to have a **negligible** or no effect in relation to achievement of the SA objective(s).
-	The option is likely to have a **minor negative** effect in relation to achievement of the SA objective(s).
--	The option is likely to have a **significant negative** effect in relation to achievement of the SA objective(s).
?	It is **uncertain** what effect the option will have in relation to achievement of the SA objective(s).
+/- or ++/--	The option is likely to have an equal mixture of **both minor or both significant positive and negative** effects in relation to achievement of the SA objective(s).

3.10 Section 5 of the ISA sets out that Thurrock hav

- Option A: Set a housing target that mirrors th using the standard method (1,173).
- Option B: Set a housing target higher than Th calculated using the standard method to suppor

3.11 The ISA scores both options to have similar ef scoring marginally better than Option A, and that this i forward in the Preferred Options stage.

3.12 Table 5.11 of the ISA summaries the SA scores f agree with the scoring, it should be noted that t the preferred option, but it is systematic way of

well they achieve the SA sustainability objectiv
inaccuracies. The matrices below highlights where
scoring of the development options. The Appendix A1 men

3.13 The italicised text in the tables below indicat
presented in the ISA Report

Table 3.2 ISA Summary Matrix for Major Urban Exte

	1. Air Quality	2. Biodiversity, Flora & Fauna	3. Climate Change & Energy	4. Historic Environment	5. Flood Risk	6. Geology & Soils	7. Landscape, Townscape & Visual	8. Materials & Waste	9. Noise	10. Water Resources & Quality	11. Economy & Employment	12. Education & Skills	13. Housing	14. Crime & Safety	15. Equalities	16. Health & Wellbeing	17. Access to Services & Facilities
South Ockend	- ?	- -	+ +	- -	- -	- -	- -	0	- -	- ?	+	+ +	+ +	0	+ ?	+ + / ?	+ +
Lakesi	-	- -	+ +	- ?	- -	-	- -	0	- -	- ?	+	+ +	+ +	0	+ ?	+ + / ?	+
Aveley	- ?	- -	+ +	- -	0 ?	- -	- -	- ?	- -	- ?	+	+ +	+	0	+ ?	+ + / ?	+
Chadwe St. Ma	- ?	- -	+ +	- -	- -	- -	- -	- ?	- -	- ?	+	+ +	+ +	0	+ ?	+ + / ?	+ +
East T	- ?	- -	+ +	- -	- -	- -	- -	- -	- -	- ?	+	+ +	+ +	0	+ ?	+ + / ?	+ +
Corrin	- ?	-	+ +	- ?	- -	-	- -	0	- -	- ?	+	+ +	+ +	0	+ ?	+ + / ?	+
North Grays	-	- -	+ +	- -	0 ?	- -	- -	0	- -	0	+	+ +	+	0	+ ?	+ + / ?	+

Table 3.3 Iceni ISA Matrix

	1. Air Quality	2. Biodiversity, Flora & Fa	3. Climate Change & Energy	4. Historic Environment	5. Flood Risk	6. Geology & Soils	7. Landscape, Townscape & V	8. Materials & Waste	9. Noise	10. Water Resources & Quality	11. Economy & Employment	12. Education & Skills	13. Housing	14. Crime & Safety	15. Equalities	16. Health & Wellbeing	17. Access to Services & Fac
South Ockend	- ?	+	+ +	- ?	- ?	- -	- ?	0	0 ?	- ?	+	+ +	+ +	0	+ ?	+ + / ?	+ +
Lakesi	-	- -	+ +	- ?	- -	-	- -	0	- -	- ?	+	+ +	+ +	0	+ ?	+ + / ?	+
Aveley	- ?	- -	+ +	- -	0 ?	- -	- -	- ?	- -	- ?	+	+ +	+	0	+ ?	+ + / ?	+
Chadwe St. Ma	- ?	- -	+ +	- -	- -	- -	- -	- ?	- -	- ?	+	+ +	+ +	0	+ ?	+ + / ?	+ +
East Tilbury	- ?	- -	+ +	- ?	- -	- -	- -	- -	- ?	- ?	+	+ +	+ +	0	+ ?	+ + / ?	+ +
Corrin	- ?	-	+ +	- ?	- ?	-	- -	0	0 ?	- ?	+	+ +	+ +	0	+ ?	+ + / ?	+
North Grays	-	- -	+ +	- -	0 ?	- -	- -	0	- -	0	+	+ +	+	0	+ ?	+ + / ?	+

Summary of Changes from the ISA for the Thurrock L

3.14 On review of the ISA the following amendments t Tilbury:

- Biodiversity (significant negative impacts) wi Zone (IRZ) for a number of SSSIs as well as the

the Thames Estuary and Marshes Special Protecti
insufficient information at this stage to determ
which could arise as a result of major urban exp
Regulations Assessment (HRA) will be undertaken
in this location.

- Historic Environment (minor negative uncertain): Ther
assets located around East Tilbury, and it is re
area has the potential to result in negative ef
impacts on designated heritage assets will dep
development, which is currently unknown, and it
mitigated by design

- Landscape, Townscape and Visual (significant negative): Ther
within Landscape Character Areas (LCAs) conside
housing development which could therefore result
landscape character are dependent on the locatio
is unknown at this stage and likely to be mitiga

- Noise (minor negative impact uncertain): In relation to no
location, scale and nature of the development
development in this area could result in sensiti
to noise sources, mitigation measures to addre
embedded into the design.

3.15 The amended SA Framework clearly demonstrates t
more sustainable than originally identified within
effects which are uncertain at this stage of the p
more detailed policies and site allocations are as
Consequently, a major urban expansion at East Till
option for meeting housing need within Thurrock.

Alternatives

3.16 The review of alternative options is a key requ
12(2) of the SEA Regulations, and states that any
through ISA. The Issues and Options (Stage 2) is a
of high-level options to be considered as the Loca

3.17 For example, the ISA undertaken for East Tilbur
fewer potentially significant negative effects tha
This included effects in relation to the histori
uncertainty against the significant negative biodi
and visual amenity effects. This demonstrates that
and should therefore be considered at an area / si
the likely significant effects. This is further su
ISA Report which considers seven major urban ext
against the SA Objectives.

3.18 A more detailed assessment of the alternative o
process, as a preferred spatial development option
This should consider the conclusions and recommend
2) stage of the process, including the identificat
delivering the required housing growth within the

4. SUMMARY AND RECOMMENDATIONS

4.1 Cogent have an interest in land at East Tilbury
Local Plan to promote their Site, have instructe
Appraisal (ISA) of the Thurrock Local Plan: Issues
Thurrock Local Plan (December 2018) comprises Stag

4.2 A number of housing growth options have been co
Expansion (at least 1,500 homes) which is identifi

4.3 No specific site allocations have been conside
available at this stage to conduct an assessment a
the housing growth options are uncertain and will

4.4 Based on the analysis undertaken in Table 5.10
which could provide the required housing within Th
negative effects identified against any of the S
uncertainty associated with this option.

4.5 It is unlikely that a single housing growth opti
and therefore it is likely that a combined approa
provide a positive growth option, dependent on th
through the following amendme

- Biodiversity (significa
Zone (IRZ) for a number of SSSIs as well as the
the Thames Estuary and Marshes Special Protecti
insufficient information at this stage to determ
which could arise as a result of major urban exp
Regulations Assessment (HRA) will be undertaken
in this location.

- Historic Environment (m
assets located around East Tilbury, and it is re
area has the potential to result in negative ef
impacts on designated heritage assets will dep
development, which is currently unknown, and it
mitigated by design.

- Landscape, Townscape and Visual (sEiagsnti fTiiclabnutr yn eigs within Landscape Character Areas (LCAs) conside housing development which could therefore result landscape character are dependent on the locatio is unknown at this stage and likely to be mitiga

- Noise (minor negative impact) (uncertain) relation to no location, scale and nature of the development development in this area could result in sensiti to noise sources, mitigation measures to addre embedded into the design.

4.6 A more detailed assessment of the alternative op process, as a preferred spatial development option However, this should consider the conclusions and Options (Stage 2) stage of the process, including option for delivering the required housing growth

A1. AMENDED SA FRAMEWORK FOR EAST TIL

Table 4.1 Review of the ISA Objectives: East Tilbury

ISA Objectives	SEA To	Additiona (HIA / Eq	SA Scor	Amend SA Sc	Commentary
2. Biodiversi Fauna Conserve and e Thurrockôs bio including all non-statutory sites, notable habitats and s	Biodiv Flora Fauna Human H	HIA: Access Open Spac Nature EqIA: N/A HRA: Urbanisation; Recreational Pressure; Atmospheric Pollution; Water Abstraction; Water Quality	--	--?	East Tilbury is located within the for the Muckington Flats and Marshe outer IRZ for the Thames Estuary an Ramsar site. Linford Wood Local Nat located to the north of East Tilbu railway line. Areas to the west of East Tilbury a 1km from the European designated previously, a separate HRA will be preferred option has been identifi potential for likely significant e Ramsar site. Insufficient details a to determine whether the Local Pla likely significant effects on the E the SA Score should be amended to (uncertain). This should be reviewed in t preferred option and the supporting required.

ISA Objectives	SEA To	Additiona (HIA / Eq	SA Scor	Amend SA Sc	Commentary
4. Historic E Conserve and e Boroughôs cult and historic a settings	Cultur Herita includ archite and archaeo herita	HIA N/A Eq IA N/A	- - ?	- ?	There are a number of designated h and around East Tilbury including s (including the Grade I listed Chur Grade II* listed Church of St. John remains and the East Tilbury Batte World War anti-aircraft battery Scheduled Monument. The East Tilbury Conservation Area centre. Major urban expansion in this area impacts on the setting of these insufficient details are available these impacts. Consequently, it is premature to c negative effects (uncertain) impac may occur. This score mshnoourld be a negative (uncertain) and reviewed once details regarding the exact locati character of the urban expansion op
7. Landscape, Townscape an Impacts Maintain and e Thurrockôs lan townscape, ens development do	Landsc Human H	HIA Air Qua Noise a Neighbour Amenity Eq IA N/A	- -	- - ?	It is recognised that the Belhus Farmed River Terrace Gravels LCA B1: Lower Mar Dyke River Valley considered to be of high sensitivit development. However, in order to reduce the po negative effects it is likely tha

ISA Objectives	SEA To	Additiona (HIA / Eq	SA Scor	Amend SA Sc	Commentary
detract from views and loca distinctivenes		HRA N / A			palette selected for the developme complement the existing landscape. The exact nature of the impacts landscape character cannot be dete details on the scale, location an expansion are available. It is ackn impacts on the landscape are like character, however this is not to be a negative (uncertain) impact at this stage and should be subse further information and assessmen character is undertaken.
9. Noise Avoid or reduc of noise pollu residents and	Popula Fauna Human H	HIA Noise	- - ?	- ?	Additional development in a predom inevitably cause some noise distur most of the areas earmarked for dev on the periphery of the existing u once these developments are operat be significant. There is potential for negative n during the construction phase of however measures to mitigate agains will be provided in the Construc Management Plan (CEMP) or similar planning application. A noise assessment will be underta planning application and associated identified as required. On this bas negative (uncertain) impact in relation to n occur. This should be reviewed once exact location and layout of develo

Cogent
Land LLP

Stratland Management Limited | 33 Margaret Street | London | W1G 0JD

contact

From: Plantenquiries <plantenquiries@catelecomuk.com>
Sent: 14 October 2019 19:09
To: contact
Cc: Paul Harrington; Jim Amos
Subject: C2 Enquiry - Proposed Flexible Generation Plant in Thurrock

Please Note: Our search criteria has changed. We previously searched for Colt Network which was within 200 metres, this has now changed to 50 metres. The negative response will be for all enquiries that the network is 50 metres or more away from the place of enquiry.

Dear Sir/Madam,

Thank you for your enquiry for the above reference.

We can confirm that Colt Technology Services do not have apparatus near the above location as presented on your submitted plan, if any development or scheme amendments fall outside the 50 metre perimeter new plans must be submitted for review.

Search is based on Overseeing Organisation Agent data supplied; we do not accept responsibility for O.O. Agent inaccurate data.

If we can be of any further assistance please do not hesitate to contact us.

Kind regards,

Plant Enquiry Team

C.A. TELECOM UK LIMITED

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