



Thurrock Council Local Plan Review

On behalf of **Thurrock Council**



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Executive Summary

Section 1 – Introduction

1. This sets out the nine tasks that were involved in the 3-month Local Plan Review and which structure this Final Report. These are summarised in Sections 2 – 9 below of the Final Report below and within Appendices A – F in more detail.
2. The background to this Local Plan Review is set out commencing with the extant Core Strategy original adoption in December 2011 and explains the work undertaken since that time, the Local Plan's evolution, the progress of Local Development Schemes (LDS), evidence base studies progress, progress on consultation versions of the Local Plan Issues and Options stages, the context of the Joint Strategic Framework (JSF) for South Essex, the latest Regulation 18 consultation and the key reasons for delays in Local Plan progress over recent years.
3. The Stantec commission for the Local Plan Review is then briefly set out to build on the work of the Planning Advisory Service (PAS) Review in December 2023. It noted that this Final Report was prepared mostly before, but also following the General Election on 4 July 2024. The outcome is now clear, but there will be consequential changes to policy and legislation that would need to be accounted for, once known, although the broad direction of policy change has been announced in early July 2024.

Section 2 – Task A: Review/Comparison of Past and Current Local Plan Proposals

4. This Task involved reviewing and summarising all past and published versions of the early stages of the Local Plan – Issues and Options Stage 1 (2016), Issues and Options Stage 2 (2018) and the Regulation 18 Initial Proposals Document (IPD) (December 2023) – it then sets out some 46 summary conclusions from these reviews that will help improve and make more sound the next stage of the Local Plan at Regulation 19.
5. In addition, although four Council strategies are referred to in the IPD, there is little evidence of those strategies or any other key Council strategies being incorporated into the Regulation 18 published version. Therefore, all 14 identified key Council strategies (including two strategies that were published by other partnerships that the Local Plan will need to have regard to), were reviewed and summarised, including the emerging Corporate Plan 2024 – 2029. Again, 3 summary conclusions were set out for the Local Plan at Regulation 19 to account for and incorporate in its published version.
6. It is clear in these reviews, particularly of the recent IPD, that there are many conclusions/issues that are critical to resolving during the course of 2024 and 2025 and most certainly before developing the Regulation 19 Local Plan – these key matters are the following: Section 2.2.1, Section 2.3.1 (e), (f), (j) and (l); Section 2.4.1 (a) - (g), (k), (l), (m) – (s); Section 2.5.1 (c) and (e); and, Section 2.6.6 (a) and (c).

Section 3 – Task B: Review of Existing Local Plan Evidence Base

7. This Task involved 8 sub tasks and Section 3 and Appendices B.1 – B.8 set out the results of an extensive and detailed review of the current Local Plan evidence base to ensure it is relevant and gaps and shortcomings are identified. Initially, Stantec, with input from Council officers, compiled a long list of approximately 80 Local Plan evidence base studies, which were either published, in production or not commenced. The long list, at the initial stage, also included other documents, which are not Local Plan evidence base documents. Technical experts/leads were then identified relating to individual technical topics, within Stantec, to undertake a review of all Thurrock evidence base documents and this involved reviewing documents and meetings

with Council officers. All evidence documents were then regrouped by topic (as set out in **Table 3.1** below), which shows how each topic is covered within the more detailed Appendices B.1 – B.8.

8. Each topic's review and conclusions are then set out in Section 3.2 – 3.12 and covered in full detail in the relevant Appendix. The 'Placemaker' tool is also covered in Section 3.13 explaining its crucial role going forward and recommendations for its future use. Recommendations are then set out (with explanations of the methodology) and covered in **Table 3.2**. This table has a list of 51 evidence studies that are colour coded, as follows:
 - i. **Purple (9)** – Priority to commence/continue now.
 - ii. **Grey (2)** – To be paused temporarily (if necessary), but only once a broad exit plan has been prepared.
 - iii. **Red (14)** – 2nd priority following Purple. Do not have to wait for Purple ones to be completed, before Red ones commenced.
 - iv. **Orange (15)** – 3rd priority following Red. Do not have to wait for Red ones to be completed, before Orange ones commenced.
 - v. **Green (11)** – Completed, but need to check if any further actions required.
9. Each evidence study is also grouped into Phase 1 (to be undertaken now) and Phase 2 (developed based on scenarios/options for growth), although there are three evidence studies (Strategic Transport Model, Playing Pitch and Indoor/Outdoor Leisure and Sports Assessments, Water Cycle Study (WCS) and the IDP) that spread across both phases. In addition, there is a need for two further Technical Papers: Technical Paper 1 (how were the IPD growth scenarios, spatial options and settlement proposals derived in the IPD); and, Technical Paper 2 (to explain how critical evidence studies were used to develop subsequent and sound growth scenarios and spatial options) to assist in the soundness of the current and next stages of the Local Plan. The graphic explanation of the need for these two Technical Papers is shown in **Figure 5.1** below.
10. There were two further inputs to determining the required evidence studies within **Table 3.2**, which are also covered in Section 4, but worth restating here:
 - i. The latest NPPF (December 2023) requirements for evidence were derived following a detailed review of the NPPF and used to guide the evidence requirements (refer to Section 4 and Appendix C); and,
 - ii. The derivation of 3 best practice, recently adopted and comparable Local Plan allowed the derivation of the evidence used in each of those Local Plan that offered guidance for the evidence requirements for the Thurrock Local Plan.
11. In addition to the above, further generic recommendations are set out in Section 3.14.8 below.

Section 4 – Task C: Review of PAS Report, Latest NPPF (including recent policy changes) and for Adopted Local Plans Identification of 3 Best Practice Examples

12. This Task involve three separate, but highly related, sub tasks that then were used to offer clear ways forward to build on the PAS recommendations for the following: priority national policy requirements; evidence study requirements and subsequent work; how to avoid delaying further or failing in the subsequent Regulation 19 Local Plan and beyond; and, the most appropriate structure/content to be used in the subsequent Regulation 19 Local Plan. All conclusions and findings are vital to incorporate in the Local Plan work going forward.
13. The 8 Government policy/legislation changes expected are set out in Section 4.3.6, however, these are clearly an assessment based in early July 2024 and following the General Election on

4 July 2024, will need constant review and updating. Such policy changes have the potential to derail, delay or change the nature of the subsequent work on evidence and Regulation 19. The key policy changes that are likely are broadly: written ministerial statements (WMSs) and PPG changes, changes to the NPPF, national development management policies and potential changes to the Local Plans regime.

Section 5 – Tasks D and E: Review of Council’s Local Plan and Other Team Resources, Skills and Management

14. This Task involved 5 sub tasks involving Local Plan management interviews, Local Plan staff interviews, understanding current consultant support, Member involvement and proposals and thoughts on an appropriate future Local Plan organisational structure. The detailed results are set out in Section 5, Figures 5.2 and 5.3, Tables 5.1 and 5.2 and Appendices D.1 and D.2.
15. In summary, collectively some 15 key points were raised, but separately management raised a further 12 points and staff a further 25 key points. Current consultant support was clearly identified with four important recommendations.
16. Regarding Council Members involvement and building on the key PAS recommendations (R4, R8, R9 and R10), the results of the recent local elections are set out in respect of the Local Plan with the proposals for a Local Development Plan Task Force. Section 5.6 then summarises the more recent proposals for a Local Plan Working Group (LPWG) with its role and purpose, membership and possible terms of reference and specific recommendations.
17. In Section 5.7 and following the review of existing Local Plan team, other officers who manage or produce studies for the Local Plan, Stantec sets out the recommended Local Plan team structure, management and other officer support in **Figure 5.3** below. These recommendations have been discussed with the Chief Planning Officer, however, it is acknowledged that these recommendations are made without knowledge of the current planning services restructure. Furthermore, it is important to note that the following recommended new Strategic Planning Team structure is based on the assessed technical requirements necessary for effective delivery of the Local Plan and has not accounted for any budgetary constraints.
18. Section 5.8 sets out clear recommendations for both broad and specific changes to the roles and responsibilities of all Local Plan related staff.

Section 6 – Task F: Summary of Thurrock’s Communities Views Over Time

19. This Task involved a thorough review of the results of all previous consultations – Issues and Options Stages 1 and 2 the Community Planning Days/Design Charettes and will involve incorporating the results of the IPD consultation, once received. The results/conclusions from each consultation stage are summarised in Sections 6.2 – 6.4 below and the IPD consultations remain as a gap until received.
20. During this detailed review some 78 ‘key matters of significant’ were identified, for the Local Plan to consider and/or address in its subsequent Regulation 19 work. These matters have not been identified before but remain critical to incorporate for the soundness of the Local Plan.
21. Two further matters are highlighted: the importance of ensuring compliance with the current ‘Duty to Cooperate’ legal requirement and for Local Plan soundness; and, the need to utilise the Council’s PR/Press, Marketing, Graphics central departments during the subsequent Regulation 19 consultations – this may also involve the use of additional and appropriate software to assist in dealing with subsequent consultation responses, which should be commissioned later.

Section 7 – Task G: Review of Existing Integrated Impact Assessment (IIA)/Sustainability Appraisal (SA) for the Local Plan

22. This Task was to provide a review and summary of the Integrated Impact Assessment (IIA) of the Regulation 18 IPD document. This review has evaluated the IIA of the Thurrock Local Plan Initial Proposals Document (IDP) and its relationship to Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) Regulations and the Habitats Regulations Assessment (HRA) (i.e. the Conservation of Habitats and Species Regulation 2017 (as amended)), the requirements of the Town & Country Planning (Local Planning) Regulations, 2012 (especially Regulation 18) and the Planning & Compulsory Purchase Act, 2004 Section 19(5); and, it has understood and analysed the previous progression of SA work in 2016, 2018 and 2022. Finally, it makes recommendations for any actions required and the process going forward into Regulation 19.
23. Section 7 is structured around how the review was approached, what documents were reviewed and particularly the compliance, technical adequacy and identification of further work and updates needed subsequently for the next stages of the Sustainability Appraisal. Overall, it is concluded that the current IIA presents a robust methodology demonstrating compliance with the regulations and provides an adequate assessment appropriate to the requirements at Regulation 18 stage – this is notwithstanding comments above concerning the growth scenarios and spatial options not being based on robust and sound evidence.
24. A critical part of the ongoing IIA work must be closely related to the subsequent development of growth scenarios and spatial options (as set out above in **Section 3.14**). It is vital that these growth scenarios and spatial options are developed based on evidence and following a thorough IIA assessment. Also, it is vital that the Local Plan Programme (in **Table 9.1**) is used to determine the IIA progress through to Regulation 19 and beyond, as it will ensure necessary IIA assessments of growth and spatial scenarios/options are undertaken at critical and appropriate times and such analyses/assessments necessarily feed into the selection of the preferred option for Regulation 19 publication (refer to Sections 7.4.13 – 7.4.17, Section 7.4.20 and Sections 7.5.1 – 7.5.7 below). **This is a critical matter and must be addressed.**
25. Notwithstanding the above and as contained in Section 7, there are 15 additional recommendations have been made to strengthen the assessment as it progresses towards Regulation 19 stage, as set out in Section 7.5.7 below.

Section 8 – Task H: Current Status and Effects of Major Projects on the Local Plan

26. This Task involved the identification, review and summary findings related to 12 major projects (DCOs, LDOs, Regeneration schemes and major development projects) at various stages of development) and the effects of such project on the Local Plan going forward. The summary analyses and results (involving project overview and plan, consents status, topic based potential impacts and strategic Local Plan impacts) are set out in Sections 8.2 – 8.5 and in more detail in Appendices F.1 – F.12. Mapping is provided in Figure 8.1 and within the relevant Appendices.
27. The overall purpose of this Task was to provide an overview of the scale and nature of the major development projects within the Council area, while providing a focus on the likely impacts and possible mitigation measures and the more strategic impacts on the Local Plan. The Local Plan team will need to include a Local Plan policy for each strategic site (the full list to be concluded during the course of the Local Plan Regulation 19 production), but it could include these 12 sites and potentially others when the scenarios and Preferred Option for growth are confirmed.
28. Furthermore, the Local Plan team will need to ensure that the information received on each of these 12 sites is fed into each of the Local Plan evidence base studies, as they will each have an impact and create housing and social infrastructure needs, both individually and

cumulatively. Clearly, the positive and negative effects that these major projects have on the direction and content of the Local Plan cannot be over-stated.

Section 9 – Task I: Overall Recommendations, Local Plan Programme and Finances

29. This Task, in effect, was a summary and conclusion to the previous detailed Tasks A – H. Section 10 immediately below and Section 9.3 – 9.6 in the Final Report below provide the main 50 recommendations, therefore this summary will focus on the other main aspects of this Section 9, namely the Local Plan Programme, Risks, Funding and Conclusions.
30. Whilst the recommendations below cover these aspects, it is important that the current Business Case is updated soon; the proposed Local Plan Programme (in **Table 9.1**) is constantly reviewed and updated monthly; that the Local Plan Reserve budget is monitored and updated regularly to understand the spend and funding remaining and further detail is provided to determine the rationale for additional funding that will be necessary; and, that the Risk Register is monitored and updated regularly.
31. Whilst the above is underway, the LDS should be updated in Q4 2024 (informing the SoS informally and formally once approved by the Council), involving Papers and proposals going to Cabinet and Council in September/October 2024. In addition, as mentioned above, an additional sum to the current Local Plan Reserve is likely to be required to ensure the Local Plan is funded until ‘adoption’ and detailed estimates should be provided, as required, for the appropriate additional funding.

Section 10 – Summary of 50 Recommendations

32. The 50 recommendations set out in Section 9 below in bold text have been derived for Sections 2 – 8 and are set in an overall context in Section 9. The list below sets out each of the recommendations in summary form, for convenience.
33. However, it is vital that a ‘Recommendations Tracker’ is set up to monitor progress on each recommendation and for the Local Plan team to report to senior officers and Members regularly.

Summaries for Tasks A – H

Task A (Review/Comparison of Past and Current Local Plan Proposals)

Recommendation R1 – It is strongly recommended that each of and all these 47 conclusions set out in Sections 2.2 – 2.6 above are used and acted upon in the development of the evidence studies, the formulation of more robust growth scenarios and spatial options, the development of the Preferred Option for growth and the preparation of the Regulation 19 publication submission. In addition, the Local Plan Vision and Strategic Objectives must be revisited and agreed.

Task B (Review of Existing Local Plan Evidence Base Studies)

Recommendation R2 – the specific recommendations/proposals set out in Table 3.2 and Sections 3.2 – 3.12 above should be followed for both Phase 1 and 2 evidence studies, but monitored and updated on a weekly/monthly basis and managed by the Local Plan Manager (or equivalent) and the Local Plan Project Manager.

Recommendation R3 – each evidence base document needs to have a clear Local Plan officer ‘owner’ – even if it is being produced by another team in the Council. The Local Plan officer ‘owner’ should manage (or input into) all Briefs, Project Plans, Methodologies and Draft Reports.

Recommendation R4 – Local Plan Manager (or equivalent) needs to manage ALL Local Plan evidence studies, have regular catchups with evidence base ‘owners’, check key documents, such as Briefs, Project Plans, Methodologies and Draft Reports and it is vital to build in time to produce a Brief and Project Plan for ALL new studies/strategies – for those being undertaken internally and by consultants. Agree Briefs and Project Plan with Local Plan Manager before work commences.

Recommendation R5 – the evidence base studies should be developed in two phases: Phase 1 – to inform the scenarios for growth and draft Preferred Option for growth and be accompanied in 2024 with Technical Paper 1; and, Phase 2 – evidence that is developed based on the growth scenarios and spatial options to inform the final Preferred Option for growth and be accompanied in early 2025 by Technical Paper 2.

Recommendation R6 – build in time in the overall Local Plan programme for consultants to submit fee proposals and be instructed, so that there is time for purchase orders and Works Orders to be put in place. Thurrock Accounts and Legal departments need to sign-up to undertaking these tasks within a set number of days, so that it can be worked into the overall Local Plan programme.

Task C (Review of the Planning Advisory Service (PAS) Report, Latest National Planning Policy Framework (NPPF) and Adopted Local Plans Three Best Practice Examples)

Recommendation R7 – this simply supports the four PAS Local Plan related recommendations set out in Section 4.2 above. Furthermore, a first-class project manager should be recruited to manage the process through to adoption.

Recommendation R8 – the Local Plan team should review Appendix C and the NPPF when updating the evidence base or undertaking work on strategic sites, growth scenarios/spatial options or the preferred option for growth, to ensure policy compliance is robust and develop a Local Plan which will be found sound. In addition, other policy changes are summarised in Sections 4.3.5 – 4.3.6.

Recommendation R9 – it is possible following the General Election on 4 July 2024 and the previous proposals for Local Plan transitional arrangements that the Local Plan system may change, if so, it would have a major impact on the Local Plan Programme that is proposed in Task I. The Council should track and monitor any changes to Local Plan regime at national Government level, identify implications for Local Plan and act accordingly and quickly. In the meantime, work must commence and be completed in 2024 on Technical Paper 1 to support the Regulation 18 IPD.

Recommendation R10 – Thurrock Council needs to seriously reconsider its current Local Plan timetable and is likely to need to formally amend its Local Development Scheme (LDS) and once approved, notify the Secretary of State for DLUHC of that amended timetable, as referred to below in Recommendation R46.

Recommendation R11 – for each of the selected best practice Local Plans, within Tables 4.2, 4.3 and 4.4 in Appendix C, it has been set out which evidence base documents were part of each Local Plan that were then used to gain adoption. These three evidence based document list examples were compiled to produce Table 4.5, which sets out the list of evidence base documents that are considered to be required for the Thurrock Local Plan.

Recommendation R12 – in addition, and again for each of the selected Local Plans, a list of their structure/content for each Local Plan was prepared and from this, recommendations are made about both the most appropriate structure for the Thurrock Local Plan and whether the Initial Proposals Document (IPD) for Regulation 18 structure/content was appropriate. The

recommendations for the Local Plan team structure are set out in Sections 4.35 and 4.36 of Appendix C.

Tasks D and E (Review of Council's Local Plan and Other Teams Resources, Skills and Management)

Recommendation R13 – Local Plan team and technical officers need to work with consultants to produce and agree a Brief and Project Plan for both existing and new Local Plan evidence base studies being produced by consultants. Agree Briefs and Project Plan with Local Plan Manager before any work commences.

Recommendation R14 – each evidence base document needs to have a clear Local Plan officer 'owner', so as to **ensure** consultants are managed efficiently and outputs are agreed and delivered to programme. The Local Plan officer 'owner' should manage (or input into) all Briefs, Project Plans, Methodologies and draft Reports.

Recommendation R15 – the Local Plan Manager and/or Local Plan Project Manager needs to manage ALL Local Plan evidence studies, have regular progress meetings with evidence base 'owners', check key documents, such as Briefs, Project Plans, Methodologies and Draft Reports, as well as attend meetings with consultants, when required.

Recommendation R16 – it is essential to build in time in the overall Local Plan programme for consultants to submit fee proposals and be instructed, so that there is time for purchase orders and Works Orders to be put in place. Thurrock Accounts and Legal departments need to sign-up to undertaking these tasks within a defined/agreed period, so that it can be worked into the overall Local Plan programme.

Members

Recommendation R17 – set up the Local Plan Working/Project Group (LPWG) during Summer 2024, with its first meeting in September 2024, using and agreeing ToR broadly in line with the above best practice example.

Recommendation R18 – ensure a Membership of 12 - 15 elected Members, including a Thames Freeport representative, two public and two landowner/business representatives, which would be quorate with 4 Member attendees and it should meet monthly.

Recommendation R19 – establish a Work Programme by the second meeting, advised by senior officers, which will involve briefing from officers monthly on progress.

Recommendation R20 – ensure all Members of this LPWG and other key Cabinet Members attend a soon-to-be established training programme for the coming year.

Recommendation R21 – appoint a Member 'champion' for the Local Plan (possibly the relevant Portfolio Holder) and encourage support from other Members.

Recommendation R22 – this LPWG will issue regular (monthly) updates to both the Planning Committee and full Council of its actions, recommendations and progress on its Work Programme.

Team Organisational Structure

Recommendation R23 – to ensure there are adequate resources, at the right level, to deliver the Local Plan according to a revised LDS timetable (refer to Table 9.1), but ensuring the evidence studies are completed, suitable scenarios developed, and a Preferred Option is development that are sound for a Regulation 19 publication.

Recommendation R24 – to ensure proper integration of all key technical functions within the Strategic Planning team to produce a sound Local Plan.

Recommendation R25 – to not downgrade existing posts if to do so might cause the current postholder to resign, when that person is a strongly valued member of the team.

Recommendation R26 – all Local Plan staff must be integrated more with other teams and build relationships outside the Strategic Services department, to ensure technical liaison is maximised and ensure all relevant aspects are considered within the emerging Local Plan, especially with Health, Housing and Employment, etc. It is vital to bring in other department officers into the relevant evidence studies (i.e. writing Briefs/commissioning consultants; developing methodologies and reviewing assessment results) or getting other departments to undertake evidence base documents) in partnership with the Local Plan team, with there always being a Local Plan officer lead.

Recommendation R27 – support the Local Plan and wider team; increase their visibility and support to staff; provide links to other key Council departments with inputs into the Local Plan; assist with training; become more involved in the ‘Duty to Cooperate’ work with neighbouring local authorities.

Team Roles and Responsibilities

Recommendation R28 – the existing roles and responsibilities for each team member needs to be simplified and limited to 3 topic/thematic areas only.

Recommendation R29 – team members should provide a monthly work programme look ahead and weekly reports of progress to their relevant Manager based on Figure 5.3 and the responsibilities set out in Section 5.8.3.

Recommendation R30 – working days and contact details for each Member need to be centrally available and easily accessible.

Recommendation R31 – all evidence studies must be preceded by agreed Technical Briefs and a Works Order and then be project managed weekly.

Recommendation R32 – priorities must be set monthly and rolled forward for each team member’s workload.

Task F (Summary of Thurrock’s Communities Views Over Time)

Recommendation R33 – the 78 ‘key matters of significant’ must be incorporated into the Local Plan going forward and set out how each has been dealt with.

Recommendation R34 – for the purposes of Local Plan ‘soundness’ and legal compliance, the cooperation with persons identified in Section 33A of the Planning and Compulsory Purchase Act (PCPA), 2004 (as amended) must be demonstrably ‘maximised’ and ‘have been dealt with rather than deferred’.

Recommendation R35 – maintains that it is vital that the Local Plan team should be supported by central Council departments (PR/Press, website, marketing/graphics teams/event organising) in the future Regulation 19 consultation, supported by a first-class Local Plan project manager (as set out in Recommendation R7 above) – this may also involve the use of additional and appropriate software to assist in dealing with subsequent consultation responses, which should be commissioned later in 2024 or early 2025.

Task G (Review of Integrated Impact Assessment (IIA) / Sustainability Appraisal (SA) for the Local Plan)

Recommendation R36 – it is recommended that further scenarios are developed from evidence and then provided for IIA analysis to ensure the growth scenarios/spatial options and the Preferred Option for growth are tested and are defensible and robust.

Recommendation R37 – the 15 recommendations are summarised in Section 7.5.5 and these should be adopted when the IIA work is re-commenced in the lead up to the Regulation 19 publication.

Task H (Current Status and Effects of Major Projects on the Local Plan)

Recommendation R38 – it is strongly recommended that each project is monitored closely by the Local Plan team and impacts mitigated (wherever possible), but more importantly the effects of each project needs to be accounted for during the preparation of the Regulation 19 publication submission.

Recommendation R39 – the Local Plan team will need to include a Local Plan policy for each strategic site (the full list to be concluded during the course of the Local Plan Regulation 19 production), but it could include these 12 sites and potentially others when the scenarios and Preferred Option for growth are confirmed.

Recommendation R40 – the Local Plan team need to ensure that the information received on each of these 12 sites is fed into each of the Local Plan evidence base studies, as they will each have an impact and create housing and social infrastructure needs, both individually and cumulatively. Furthermore, it is recommended that a single, cumulative Local Impact Report should be considered, even if outside of the formal DCO processes, so the Council can properly understand the extent of these cumulative impacts.

Key Considerations for Local Plan Programme

Recommendation R41 – introduction of a ‘Consolidation Period’ of approximately 12 months in order to undertake the Phase 1 evidence studies, complete the Regulation 18 Consultation Report, fill key Local Plan Team staff vacancies and complete two critical Technical Papers (one in the first 12 months and one subsequent to that period).

Recommendation R42 – the need to develop later during late-2024/early 2025 and based on completing key evidence studies set out in Section 3, Table 3.2 and Appendix B, the development of Local Plan growth scenarios /spatial options that are more robust and then could be used in the further IDP work and for strategic transport modelling and to inform other evidence studies that require the Preferred Option for growth, such as the Detailed Green Belt Assessment and the Local Plan Viability Update.

Recommendation R43 – recognition of the newly announced General Election on 4 July 2024 and the ‘All-Out’ local elections in May 2025 and the effect that either could have on Government and Local planning policy and legislation.

Recommendation R44 – three DCOs would have progressed further, and they could significantly affect the proposals coming forward in the Local Plan, such as: National Highways LTC decision delayed to 4 October 2024 currently, National Grid’s Norwich to Tilbury Connection is likely to have been submitted around mid-2025 and will therefore have more clarity; the Thurrock Flexible Regeneration Plant approved DCO may have determine its delivery more clearly; and, the Thames Freeport will have further developed its planning proposals via a DCO(s) or an LDO, which could significantly affect the Local Plan.

Local Plan Programme

Recommendation R45 – this revised Local Plan Programme (Table 9.1) should be approved and updated monthly and used as the basis for updating the LDS in Q4 2024 and this programme must be adhered to by the Local Plan team and other related teams by managing the evidence base ‘owners’, consultation with other teams and senior officer reviews.

Recommendation R46 – it is strongly recommended to review and update the Local Plan Business Plan and then update the LDS in Q4 of 2024 and to notify Government of any such changes.

Recommendation R47 – for senior management and Members to support and approve the revised Local Plan Programme prior to any publication of a revised LDS.

Risks to Local Plan Programme

Recommendation R48 – the key risks are set out in Section 9.4.10 and should be incorporated into the existing Corporate Risk Register or amend those risks relating to the Local Plan accordingly.

Local Plan Funding

Recommendation R49 – that the Local Plan Reserve is closely monitored on a quarterly basis to understand remaining funding and, as appropriate, update and increase the Local Plan Reserve in Q1 of 2025 for £1 - £2m to ensure adequate funding through to Local Plan adoption. A more detailed analysis of current spend against Local Plan Reserve budget is required and an estimate of additional funding required (with full justification) until Local Plan adoption.

Conclusion

Recommendation R50 – that senior management and Members endorse and approve and use all recommendations in this Final Report as Council policy to be adopted in subsequent Local Plan work going forward–

1 Introduction

1.1 Introduction

- 1.1.1 This Final Report is a summary of all the work undertaken for this Local Plan Review that is contained in the more detailed Appendices (as set out in the Table of Contents and Appendices sections below). This Report is structured, as set out below and is provided in more detail in Section 2.3 below.
- a. Task A – Review/Comparison of Past and Current Local Plan Proposals.
 - b. Task B – Review of Existing Local Plan Evidence Base and Gap Analysis and Identification of Further Work and Updates.
 - c. Task C – Review of PAS Report, latest NPPF and other Key Policy Changes and Identification of three Best Practice Examples of Recently Adopted Local Plans.
 - d. Tasks D and E – Review of Council Local Plan Team and Other Teams Resources and Skills/Resource Gaps.
 - e. Task F – Summary of Thurrock’s Communities Views (covering public, businesses, developers, landowners and key statutory/local consultees) Over Time.
 - f. Task G – Review of Integrated Impact Assessment (IIA) (Sustainability Appraisal (SA)/SEA/HRA) for the Local Plan.
 - g. Task H – Understand Current Status and Effects of Key Major Projects on the Local Plan.
 - h. Task I – Review Latest Local Development Scheme (LDS) and Local Plan Financing and then Develop Recommendations/Proposals for the coming 2-3 years, including Detailed Programme to Regulation 19 and beyond.
- 1.1.2 The above Tasks were set out in the contract with the Council, but during the progress of the work these have been supplemented to reflect the needs of the Council, the Local Plan and Strategic Services staff, senior officers and to adapt to the changing needs of the project.

1.2 Background

- 1.2.1 The extant Local Plan Core Strategy was originally adopted on 21 December 2011 and was updated on 28 January 2015 and details can be found on the Council’s website – [Core Strategy Local Plan | Current development plan | Thurrock Council](#).
- 1.2.2 It is clear that the Council has undertaken a substantial amount of work over the past few years (which is listed below), but further work is necessary to develop a more detailed programme within this commission, which is set out in **Section 9.4 and Table 9.1**; and, in order to produce a sound Local Plan. The work undertaken to date covers the following:
- a. Issues and Options Stage 1 Report and Consultation, September 2016;
 - b. Issues and Options Stage 2 Report and Consultation, December 2018;
 - c. LDS dated December 2015, late-2022 and September 2023;
 - d. Local Plan Evidence Base;
 - e. Results of the Community Planning Days (Design Charettes), 2019 – 2022;

- f. Local Plan Initial Proposals and IIA, December 2023; and,
 - g. PAS: Planning Peer Review of the Council's Planning Service, December 2023.
- 1.2.3 The initial LDS for the emerging Local Plan was issued in December 2015 and since then the Council made progress in developing key parts of the Local Plan evidence base. Those key evidence documents indicated that the emerging Local Plan would need to explore opportunities for denser urban developments and Green Belt release if it is to meet its full objectively assessed housing needs over the next 15 – 20 years. The Council published its Issues and Options Stage 1 Report of Consultation in September 2016, following consultation in February – April 2016 – [localplan_issuesoptions1_201602_comments.pdf \(thurrock.gov.uk\)](#).
- 1.2.4 The Council then published its Issues and Options Stage 2 consultation document on 12 December 2018 with consultation concluding on 29 March 2019, and the report to full Council on that consultation considered and accepted in October 2019. There were 700 organisations and individuals that responded with almost 3,000 separate comments to the 40 questions. The full consultation document is still available on the Council's website – [Local Plan Issues and Options \(Stage 2\) | Have my say | Thurrock Council](#).
- 1.2.5 During the past few years the Council has been assembling its evidence base to support the Local Plan and these documents can be found on the Council's website – [Evidence to support the Local Plan | New Local Plan for Thurrock | Thurrock Council](#). This evidence base is substantial, but is incomplete and possibly out-of-date, in the case of certain documents. Identifying these gaps will be a crucial outcome of this activity.
- 1.2.6 Between 2019 and 2022 the Council held Design Workshops/Charettes in towns and villages across Thurrock, so local people could be involved in planning their community's future. These workshops, called 'Design Charrettes', included residents and other local stakeholders, such as landowners, community groups and infrastructure providers. Details of these can be found on the Council's website – [Community planning days \(design charrettes\) | New Local Plan for Thurrock | Thurrock Council](#). These locations were chosen because land is being promoted for development within each area as part of the Local Plan process. The Council wanted a better understanding of the issues and opportunities that might arise from more development in these areas. Before the workshops the Council invited communities to fill-in an online survey covering topics like the need for housing, access to jobs, open spaces and ease of movement. After, the Council held community events so local people could share their thoughts on high-level sketches produced at each workshop.
- 1.2.7 A major factor in the overall Local Plan progress delays has been the Lower Thames Crossing (LTC), which has only recently completed its Examination (December 2023), with a Secretary of State decision due by 20 June 2024. The proposed LTC is a Nationally Significant Infrastructure Project (NSIP), and the proposed alignment and design threatens to significantly undermine the efforts of the Council to plan to meet its housing needs in full and to support economic growth and the regeneration of local communities. This is due to the current proposed alignment and design having an adverse impact on the potential to bring forward sites for development along the entire length of its route.
- 1.2.8 An updated LDS was published in September 2022, but as noted by the Council, due to slight delays (partly due to leadership changes and recent elections) in preparing the Local Plan an updated version has been published recently. So, in September 2023 the Council published its updated LDS, which is on the Council's website – [localdevelopmentscheme-202309-v01.pdf \(thurrock.gov.uk\)](#). This new timetable for completion of the emerging Local Plan. This timetable for the emerging Local Plan over the following three years is set out below.

| Stage | Target Date |
|--|------------------|
| Scoping | COMPLETED |
| Issues and Options (Stage 1) | COMPLETED |
| Issues and Options (Stage 2) | COMPLETED |
| Local Plan: Initial Proposals Consultation (Regulation 18) | Winter 23/24 |
| Local Plan: Publication Draft Consultation (Regulation 19) | Autumn/Winter 24 |
| Submission to Secretary of State for examination in public (Regulation 22) | Spring 25 |
| Commencement of Examination hearings | Summer 25 |
| Inspector’s Report expected | Spring 26 |
| Adoption of the Local Plan by Council | Summer 26 |

- 1.2.9 It is clear that the LDS will need updating following the General Election on 4 July 2024 to more accurately reflect the timetable for key evidence studies to be completed (such as transport modelling, growth/spatial scenario testing, IDP and others set out in **Table 3.2** below), to process representations at Regulation 19 and to cover the Regulation 22 programme. This is set out in more detail in **Table 9.1** and Sections 9.4 and 9.5 below.
- 1.2.10 The South Essex Joint Strategic Plan (JSP) covered the local planning areas of Basildon, Brentwood, Castle Point, Rochford, Southend-on-Sea and Thurrock (the South Essex Councils or ASELA). That area is located on the edge of London and is well connected with several strategic roads linking communities within and outside South Essex. It is also an important national and international gateway, with three major ports on the Thames Estuary and London Southend Airport. It was intended that the South Essex JSP will be prepared jointly by all six LPAs and Essex County Council. However, ASELA agreed to abandon the JSP (either statutory or non-statutory) and instead produce a lighter-touch, non-statutory Joint Strategic Framework (JSF). The JSF itself has been under review and there is uncertainty as to its function and timetable for its completion. This position will be kept under review and the LDS may need to be updated in due course, as a timetable for the preparation for the South Essex JSF is confirmed.
- 1.2.11 The Council recently published its Regulation 18 (of the Town & Country Planning (Local Planning) (England) Regulation 2012 (as amended)) – Local Plan Initial Proposals, together with an Integrated Impact Assessment (IIA) and consultation responses were due by 19 February 2024, with the Consultation Report being completed in summer 2024. Details can be found on the Council’s website – [Thurrock Local Plan | New Local Plan for Thurrock | Thurrock Council](#). It should be noted that this document does not include an option ‘without LTC’ and does not seem to account for the ‘with LTC’ option properly. Furthermore, it contained 4 growth scenarios and 5 spatial options and settlement growth options, but without a clear understanding of how they were derived.
- 1.2.12 It is clear that there have been a number of difficulties with achieving the initial programme for Local Plan adoption from 2015 until now and these can be listed as:

- a. Lower Thames Crossing DCO uncertainty, impacts (such as on transport modelling and its impact on growth scenarios and the preferred option) and design affecting potential sites and viability; and the emerging proposals from National Grid (NG) for the Norwich to Tilbury DCO project. Also, other major projects (as set out in Section 8 and Appendix F) may have a bearing on the Local Plan Programme;
- b. Incomplete (gaps) and ensuring an up-to-date evidence base (even on those currently available) – the forensic analysis of evidence gaps was part of Task B and is set out in Section 3 and Appendix B and particularly in Table 3.2);
- c. Changing Government planning policy, such as the NPPF and further policy changes planned in 2024 and 2025;
- d. Council leadership changes and annual local elections;
- e. Inadequate project management of the Local Plan tasks, including evidence base studies, and Local Plan team leadership; and,
- f. Inadequate Council resources, including Local Plan officers and Local Plan team leadership.

1.3 Local Plan Review – Stantec Commission

- 1.3.1 Notwithstanding the Background information above, the Council sought support from Stantec to review the current Local Plan to help guide the Council to the delivery of a sound Local Plan, from completion of Regulation 18, which was recently out to consultation to the adoption of a sound Local Plan.
- 1.3.2 This project was commissioned in mid-March 2024 to undertake the initial review of all previous Local Plan documentation, other relevant documentation and a review of resources. This is a 3-month project to be completed by mid-June 2024 as a Draft Final Report. It would then be updated to a Final Report and Appendices following Council comments by mid-July 2024. The scope of services was set out in the contracts with the Council and the further detail for each Task is set out in the introduction to each Task in the sections below and in more detail in the Appendices.
- 1.3.3 It should be noted that this Report has been prepared largely before but partly following the General Election on 4 July 2024. The outcome is clear and there are to be consequential changes to policy and possibly legislation that would need to be accounted for, once known, although the broad direction of policy change has been announced in early July 2024.

2 Task A: Review/Comparison of Past and Current Local Plan Proposals

2.1 Introduction

2.1.1 Task A was made up of three separate, but inter-connected parts. The Task is set out in more detail within the contract and as subsequently developed and agreed with the Council and is set out below in summary.

Task A: Review/Comparison of Past and Current Local Plan Proposals and Consultation Documentation

- a. ***Sub Task 1 – Review of the Issues and Options Stage 1 (2016) and 2 (2018) reports documents to determine differences and similarities and changes in both topic and locational proposals to identify directions of travel, any anomalies or changes in approach or outcomes;***
- b. ***Sub Task 2 – Review of latest Local Plan - Initial Proposals Document and Design Charter (December 2023) to determine differences, similarities and changes in both topic and locational proposals to identify directions of travel, any anomalies or changes in approach or outcomes; and,***
- c. ***Sub Task 3 – Determine the key Council strategies that impact directly on the emerging Local Plan and how they are or are not adequately incorporated. Such strategies include: Backing Thurrock – a Five Year Strategy for Economic Recovery, Resilience and Return to Growth, September 2020 (Parts 1 and 2 Action Plan); Active Place Strategy, August 2020; and, Thurrock Transport Strategy, late 2022. In addition, there are two strategies: the Thames Estuary 2100 (TE2100) Plan that is published; the emerging Essex Local Nature Recovery Strategy, where these strategies are produced by other partnerships that the Local Plan will need to have regard to; and, all other current, emerging and relevant strategies (as set out below in more detail***

2.1.2 *Deliverable for Task A: a report setting out the key findings for review by Council officers to ensure all relevant matters are captured'.*

2.1.3 The above parts a) and b) work were undertaken in order to determine differences, similarities and directions of travel in terms of topics and location proposals, thereby isolating key issues, any anomalies/gaps and matters of significance and to understand the changing nature of the emerging Local Plan Proposals over the past seven years. For the part c) work, it is evident that many of the strategies, up to now, have not been informed by the Local Plan (and vice versa). It will help to ensure these other Council strategies form part of the Local Plan going forward, as appropriate.

2.1.4 **Appendix A** sets out in detail the summary and review of all the documents listed above, which is not repeated here. However, for each of the sub-Sections below, the summary conclusions are repeated.

2.2 Review of Issues and Options Stage 1 Local Plan Proposals (2016)

2.2.1 The 6 summary conclusions of this review are, as follows.

- a. **Although now out-of-date as the Issues and Options 1 (I&O1) is 8 years old, it does represent policy thinking at that time and set targets based at a regional level of 23,000 new homes and 26,000 new jobs and the redevelopment/regeneration of five**

main growth areas: Purfleet, Lakeside/West Thurrock, Grays, Tilbury and London Gateway.

- b. The consultation asked 40 questions of the public, which were very broad and based on general policy directions (thematic policy areas).
- c. There was no mapping and no spatial options, locational proposals or site allocation options produced besides concentrating future growth in 5 main urban areas and relied on the extant Core Strategy, 2015.
- d. It provided a number of useful statistics about the Borough's location and its employment, social and heritage facilities.
- e. It stressed the need for sustainable transport choices, environmental enhancement and the need to reduce Greenhouse Gases (GHGs), but without clarity or any clear direction.
- f. It was of limited value for moving the Council forward from its Core Strategy.

2.3 Review of Issues and Options Stage 2 Local Plan Proposals (2018)

2.3.1 The 13 summary conclusions of this review are, as follows:

- a. This Issues and Options 2 (I&O2) provides for clear sectoral options, locational alternatives options and clear statistically need and land requirements for housing, employment and retail/town centre uses.
- b. First time locational options were set out and offered lots of variations, often based on I&O1 comments.
- c. Very specific population, housing, employment, etc., forecast needs set out based on evidence and updated ONS data that will need updating again.
- d. It refers to key evidence based documents from 2015 – 2018 that are now out-of-date and superseded and refers to a range of remaining evidence that needed to be developed – has it?
- e. The 11 Policy Principles, Vision and 20 Strategic Objectives need review but are a valuable base.
- f. Housing, employment and town centres analyses, key issues and needs raised are solid, but need review and updating.
- g. Call for Sites needs updating, consolidating, and developing. A recent Call for Sites completed by the Council needs to be finalised.
- h. It confirms the extent of the Green Belt, and that half of potential housing sites are within the Green Belt and describes the Green Belt Assessment process so far.
- i. Strategic spatial framework provided a useful base upon which to develop the subsequent Reg 18 work.
- j. Proposals for Lakeside Basin and the role, development, and hierarchy of centres both need reconsideration.
- k. It sets out the Grays Town Centre Framework and is clear on its current status and sets out future challenges clearly.

- l. **Health and Wellbeing issues and topics were not given much prominence and now must respond to current policy and will need much further development.**
- m. **Need to better understand how the summary of I&O1 consultation responses (Table 1) has been used and incorporated, which is included as now part of Task F.**

2.4 Review of Local Plan Initial Proposals Document (IPD) (December 2023)

2.4.1 The 19 summary conclusions of this Local Plan IPD review are, as follows:

- a. **Whilst the Vision in the IPD is different, the Strategic Priorities/Principles are largely the same as set out in I&O2 in September 2018, with no very limited change – surely there need to be changes over 6 years?**
- b. **The 20 Strategic Objectives have been imported from I&O2 as the 20 Strategic Priorities in the IPD without change or updating. These need to be reviewed and amended, as appropriate.**
- c. **The follow-through from I&O2 to the IPD is not clear, although the various broad spatial options from I&O2 have been used in the IPD to create a variety of different 5-6 spatial options and 25 different area proposals in 13 settlements.**
- d. **For the proposed Local Plan document structure, it is not clear where open space and recreational elements fit into that structure.**
- e. **It is not clear how the 5-6 spatial options were generated or their relationship to the key evidence studies (or links to any key evidence docs) or to urban capacity or, GB Detailed Assessments or Needs/Land Availability Assessments (not yet completed), so that site/area selection is flawed. It is also not clear how the four growth scales in Table 1 relate to the five spatial options or how the spatial options are then translated into the 25 area proposals in 13 settlements.**
- f. **There are a number of key areas where the derivation of the area proposals is not clear, i.e. how were these area proposals developed, how sites were selected/discounted or what evidence base has been used, as it is unlikely they were developed from I&O2? Furthermore, the derivation of housing, employment and other land use proposals is not explicit.**
- g. **The overall housing growth numbers range from 17,890 – 20,870 in the main options for each settlement and between 20,600 – 24,210 when considering the various alternative housing growth options for those settlements with alternatives. It is not clear how or if these overall totals have been derived from any previous Housing Needs or Housing Land Availability Assessments. The Housing Needs and Employment Needs Assessments need to be updated.**
- h. **Useful area analysis of descriptions, previous consultations, and constraints/designations, but not clear how area proposals were derived from I&O2 or linked to evidence.**
- i. **There is no attention given in the area proposals to ‘place-making’ and the creation of a suitable area for residents, with urban realm and its key elements given no attention. This seems to be entirely contained within the Design Charter.**
- j. **The definition of Tier 1 and 2 employment areas is not clear.**
- k. **The alternative options often do not constitute real alternatives, which really should only be generated from a full range of relevant evidence (which is not yet finalised)**

and published). For instance, for Grays, there is merely two minor additional sites and no real alternative, especially not to make it a better place; for Corringham merely a reduction in new housing only; for East Tilbury and Linford the only alternative is to just remove further growth; for Purfleet-on-Thames it only adds an additional Tier 1 employment site; for Southfields there are no proposed alternatives; for Stanford-le-Hope there are no proposed alternatives; for Horndon-on-the-Hill, there are no proposed alternatives and limited alternatives at Bulphan, Fobbing and North Stifford.

- l. **Consequently, it is unclear if the Integrated Impact Assessment (IIA) process has assessed valid alternatives, for which the IIA conclusions can be relied upon or used for the next Reg 19 stage (refer to Sections 7.4.13 – 7.4.17, Section 7.4.20 and Sections 7.51 – 7.5.7 below). This is a critical matter and must be addressed.**
- m. **Potentially useful indicative proposals, in principle, for each area consultation, but again not clear how they were derived or what evidence they are based on, especially the standards used for housing needs/density/types, employment needs, social infrastructure provision, highway capacity and active travel or basis for new road connections. Such an approach may be misleading.**
- n. **Southfields has been omitted from formal consultations/engagement.**
- o. **The proposals for new settlements at Lower Langdon (a new proposal not previously raised) and West Horndon are rudimentary and dependant on significant missing technical evidence and engagement. For instance, prior to such proposals the total housing and employment numbers and urban capacity need confirmation to determine the need for any new settlements.**
- p. **Not yet clear how the Local Plan will change following the recent Council decision to adopt Primary Care Networks (PCNs or which there are four), as the area proposals basis, instead of settlements, as PCNs cannot planning for places or people as clearly and there is a necessity to plan for specific places, meaning there may be a mismatch.**
- q. **The IPD has set out for each proposal for settlements standards of 20% for BNG, 35% affordable housing in some areas and net zero homes in certain areas. These standards are significantly higher than national standards and will require justification and evidence to support them, if they are retained going forward.**
- r. **Cumulative impacts of these proposals are not explicit, but it may have been included within the IIA (refer to Sections 7.4 and 7.5 below). If not, then there is the potential for incorrect options/area proposals and the incorrect cumulative assessment.**
- s. **The Council Members Report (that set out the recommendations and details of the IPD for its approval) dated 6 December 2023 does not overtly refer to the Design Charter, which indicates it to be of lower importance.**

2.5 Review of Design Charter (December 2023) and Latest Government Design Policy

2.5.1 The 5 summary conclusions of this Design Charter review are, as follows:

- a. **Thurrock's characteristics (Section 2) appears to omit its importance for logistics and does not refer to the impacts of LTC or Norwich to Tilbury DCO projects.**

- b. **For its four Design Principles (Section 3), it appears that the importance of housing and employment growth and design is omitted.**
- c. **It is not clear how or if the 94 design opportunities (Section 4) have been included within the IPD area proposals or its Vision and 20 Strategic Priorities.**
- d. **There is an unfortunate separation between the two documents, which emphasises the likely limited consultation responses for the Design Charter, which could be addressed by incorporating a version of the Design Charter into the Reg 19 work and submission.**
- e. **Thurrock Council must complete this work on draft Design Codes by March 2025 being undertaken by the Place, Design and Environment team, using a Project Plan dated 24 April 2024), which will then feed into subsequent work on the Local Plan (as set out in Section 4.79 of Appendix A for Task A).**

2.6 Review of Other Thurrock Council Strategies

- 2.6.1 Currently, it is understood that a draft **Corporate Plan, 2024 – 2029** is in preparation for consideration by full Council in July 2024 and is intended to set the changed context for the Council being a S114 Notice Council and its intention to become financially sustainable and a trusted/credible organisation. It is intended that it will be refreshed annually and especially following the ‘all-out’ elections of 2025. The Corporate Plan is intended to set out the relationships with other key Council strategies, including the emerging Local Plan, which may influence its direction. As the Corporate Plan is developed over the coming weeks its enabling function and context setting for the Local Plan will be finalised.
- 2.6.2 It is a clear intention that in the development and finalisation of the Corporate Plan that there is clarity about the role and functions of the Local Plan and its accompanying Infrastructure Delivery Plan (IDP), which are statutory planning documents. This is in regard specifically to the role and functions of the Place Strategy and the Thurrock-wide Growth Plan, which can then be embedded into the Local Plan as material planning considerations.
- 2.6.3 The IPD only refers to four overall Council strategies in Section 1, page 5 – Thames Estuary 2100 (TE2100), the LNRS, the Economic Strategy and Transport Strategy (see below).
- 2.6.4 These 14 main Council strategies have been prepared and/or published (with any updates also described) are the following (only a few are referred to within the IPD, page 5):
- a. **Backing Thurrock – a Five Year Strategy for Economic Recovery, Resilience and Return to Growth, September 2020 (Parts 1 and 2 Action Plan)** – this was the Council’s economic strategy and is current. A new **Draft Economic Growth Strategy, 2024 – 2034 (26pp)** is being prepared and its accompanying Implementation Plan will follow later. Currently, the approximate programme for this work is by September 2024, subject to determining the responsible Council department.
 - b. **Thurrock Skills Plan, 2022 (37pp)** – this was produced by the Thurrock Skills Development Task Force formed of the Council, several key colleges, local DWP, PoTLL and the Ortu Foundation. The Plan is a live strategy with monitoring of progress through a live Action Plan.
 - c. **Thurrock Local Plan Viability Update, March 2023 (392pp)** – although not strictly another Strategy, it is a key evidence document that is inextricably linked to the Housing Strategy and Economic Development Strategy and so is included here but is also covered in Section 3 below. This was prepared by HDH Planning & Development Ltd and was an update to the Baseline Report in July 2017 and was produced following consultation and responded to all Government legislation and policy updates up to March 2023, including

the consultation on VCIL at that time. It is understood that a further update will be undertaken later in 2024 following receipt of Reg 19 LP policies and to cover recent policy and changes to the status of viability.

- d. **Thurrock Housing Strategy, 2022 – 2027 (116pp)** – sets Thurrock Council’s direction and ambitions for housing support and services for the next five years. It recognises that housing and health are intrinsically linked, and its vision aligns with the aims and objectives of Domain 5 of the HWBS. It sets out eight core principles: What is important to you?; right time, right place, high quality; supports health and wellbeing; minimises bureaucracy; local strength-based solutions; meets statutory duties; flexible and adaptable; and, focuses on partnership working and collaborations.
- e. **Thurrock Transport Strategy (TTS), 2013 – 2026 (93pp)** – this is the Council’s current Transport Strategy. However, the Council’s website indicates that work has commenced on a new **Interim TTS** (through Mott MacDonald) for which an SEA is required, and the screening/scoping has been completed. A draft version of the Interim Thurrock Transport Strategy 2022/23 – 2037/38 was produced by Mott MacDonald in October 2022. Several issues have been raised on the draft document that require further work before it can be made public or consulted on. Mott MacDonald is no longer commissioned to continue this work and revisions will be done internally. Consultation on a revised version it is expected by the end of 2024. However, LTP4 will be informed by the updated Interim TTS and DfT Guidance once issued, which is being prepared in-house and should be completed by end 2024, including an LTP Implementation Plan.
- f. In addition, the **Local Transport Vision** was prepared internally and published in February 2023 to inform the Interim TTS and LTP4.
- g. **Active Place Strategy, August 2020 (and Appendix 1: Executive Summary, 37pp)** – it was adopted by Cabinet in January 2021 and is current. However, it comprised four parts and it is understood that three parts are being updated separately through separate briefs/needs assessments and these are being done as two separate studies: open space and play areas study; the playing pitch assessment/strategy and the indoor sports and leisure facility assessment, which is covered further in Section 3 below. However, the Active Travel Study is currently on hold and is not to be updated in the short term – it may in fact be superseded by the LCWIP (set out below).
- h. **Local Cycling and Walking Infrastructure Plan (LCWIP)** – being produced by Transport Initiatives and to be completed by end of summer 2024, guided by the DfT Technical Guidance for LAs, 2017. This work was commissioned to be completed by Transport Initiatives. An Initial draft has been prepared and is going through internal revisions. The intention is to have an approved draft version to consult on in July/August 2024. Further minor amendments are expected as a result of the consultation and a final version ready in summer/autumn 2024.
- i. **Health and Wellbeing Strategy (HWBS), 2022 – 2026 (41pp) and its Presentation version (26pp)** – this was approved in June 2022, following the consultation which concluded prior to its approval.
- j. **Health in All Policies Approach to Place-shaping document, 2023 (45pp)** – this aims partly to be a bridging product between the HWBS and the Local Plan.
- k. **Better Care Together Thurrock – The Case for Further Change, 2022 – 2026 (158pp)** – this looks at the future of health and social care and the Integrated Care approach, useful from a health and social care infrastructure point of view.
- l. **Thurrock Plan for Culture, 2024 – 2027 (32pp)** – this sets out a shared ambition and commitment to work collaboratively and embrace the values of co-creation and cooperation to deliver change through culture and creativity. It does this through a series

of three themes: Cultural Connections, Cultural Capacity and Cultural Capital, each with a series of actions underpinned by governance through a Cultural Leadership Group.

- m. **Strategic Transport Modelling** – this is managed outside the Strategic Services team at present and is covered more fully in **Section 3.4** below and in **Appendix B.3**.

2.6.5 In addition, there are two strategies: the Thames Estuary 2100 (TE2100) Plan that is published; the emerging Essex Local Nature Recovery Strategy (as set out below), where these strategies are produced by other partnerships that the Local Plan will need to have regard to in the next stages.

- a. **Thames Estuary 2100 (TE2100) Plan, April 2023** – this outlines ways to manage the risk of flooding along the Thames, setting out a vision for the estuary's future. In April 2023 the Environment Agency (EA) completed its first full review and update of the Plan originally published in 2012 following consultation during 2022. The key results of this update is built into the EA Review of the Thurrock SFRA Level 1 Paper (undertaken on the draft SFRA Level 1 and comments covered in final version), which is part of the LP evidence base (included in Task B).
- b. **Emerging Essex Local Nature Recovery Strategy (LNRS)** – this will establish biodiversity priorities and map proposals for specific actions to drive nature's recovery (this was due from Essex County Council (ECC) in February 2024, but further discussions are to be had and it is expected to be published for a 28-day consultation at end May 2024).

2.6.6 The 3 summary conclusions of this review are, as follows:

- a. **There is an absence of a published Corporate Plan that would provide overall strategic direction for all other Council strategies and the emerging Local Plan. However, it is understood that a draft Corporate Plan, 2024 – 2029 is in preparation for consideration by full Council in July 2024 and is intended to set the changed context for the Council being a S114 Notice Council and its intention to become financially sustainable and a trusted/credible organisation. It is intended that it be refreshed annually and especially following the 'all-out' elections of 2025. The Corporate Plan is intended to set out the relationships with other key Council strategies, including the emerging Local Plan. As the Corporate Plan is developed over the coming weeks its enabling function and context setting for the Local Plan will be finalised.**
- b. **The key other Council strategies broadly cover the economy, housing, transport (including cycling), health, culture, the Thames Estuary and local nature recovery, but not climate change, social infrastructure, green/blue infrastructure or open space, cultural heritage and the River Thames – although some evidence documents do cover these topics partially.**
- c. **Although the recent Local Plan document (IPD) refers in Section 1, page 5 to four Council strategies (Thames Estuary 2100 (TE2100), the LNRS, the Economic Strategy and Transport Strategy), it does not link to all the other key strategies. Also, it does not indicate if or how these four strategies have been used to develop the IPD or incorporated within it or cover the other strategies set out above; and, it is not clear or explicit how any of the above key Council strategies have been recognised or incorporated into the Reg 18 LP or how they will be used for Regulation 19. Clearly, these links must be established.**

3 Task B: Review of Existing Local Plan Evidence Base

3.1 Introduction

3.1.1 Thurrock Council is seeking support on the delivery of a sound Local Plan, from completion of Regulation 18, which was consulted on at the end of 2023, to the adoption of a sound Local Plan. Local Plans need to be based on robust evidence base, which is proportionate, relevant to the local area and up to date.

3.1.2 This section sets out the review of Thurrock Local Plan evidence base studies and gap analysis and identification of further work and updates. The scope of the review is set out below:

‘Task B: Review of Existing Evidence Base and Gap Analysis and Identification of Further Work and Updates

- *Sub Task 1 – Climate and Flooding (Level 1 SFRA)*
- *Sub Task 2 – Design and Heritage (Design Charter and six Rural Settlement assessments)*
- *Sub Task 3 – Economy (retail, employment land supply and need and Grays town centre)*
- *Sub Task 4 – Health and Wellbeing Delivery Plan*
- *Sub Task 5 – Housing (Gypsy & Travellers studies, and South Essex Needs)*
- *Sub Task 6 – Natural Environment (Green Belt, wildlife, green spaces and landscape character)*
- *Sub Task 7 – Transport (Local Transport Plan vision, site connectivity assessment, evidence baseline study and Grays town centre transport study)*
- *Sub Task 8 – Infrastructure and Viability (viability update)*

This work will initially identify three recently adopted Local Plans (identified as best practice), especially of Unitary Authorities, to identify the evidence base used and its timeframe to identify gaps, using such best practice. This work will use the evidence base within the Council’s website, however, gaps need to consider the full life cycle of the Local Plan to its adoption.

Although the core team will review the existing evidence base (according to the topics in the sub tasks above, taken from the Council website) and ensure all baseline studies are included, it will be necessary to hold a number of officer/specialist workshops to determine adequacy and currency of existing evidence and help to identify missing gaps.

Review of the evidence base on the Council website and any studies currently in preparation, to determine their currency and any gaps (especially to determine if methodologies used are robust, if the assessment results are correct and any gaps), potentially including the following:

- *Blue infrastructure study and water quality;*
- *Climate Emergency Plan delivery;*

- *Heritage baseline (through ECC);*
- *Relevant main settlement studies (beyond those rural settlement assessment studies contained within the Design Charettes);*
- *Evidence to support the various growth options set out in the Initial Proposals Document;*
- *Housing and Employment land and need studies covering each settlement;*
- *Housing and Employment growth numbers supporting evidence;*
- *Town Centre Health Checks and Retail studies updates;*
- *Social infrastructure supply and quality studies (schools, leisure, play and sports facilities/pitches, health and social care facilities, etc) to support growth ambitions;*
- *Transport modelling results on options and subsequent transport option studies to support growth;*
- *Public Transport and active travel assessments/studies;*
- *IDP and further Local Plan Viability Update;*
- *Infrastructure Study coupled with CIL/S106 work; and,*
- *The 2019 Strategic Green Belt Assessment is being built on by commissioning a Detailed Green Belt Assessment to inform the emerging Local Plan.*

Following this, it will be necessary to immediately identify additional work and develop broad scope and initial estimated costs for this missing evidence, so that the work to deal with such gaps can be initiated at the earliest opportunity and built into the work to Regulation 19 and into Task I below. Also, any work that is about to be commissioned or has recently been commissioned needs to be reviewed for its adequacy against these missing evidence gaps.

Deliverable B: a short report setting out the key findings for review by Council officers, to ensure all relevant matters are captured, with recommendations for future actions to ensure all evidence studies are completed to form part of the work to Regulation 19.'

- 3.1.3 Initially, Stantec, with input from Council officers, compiled a long list of approximately 80 Local Plan evidence base studies, which were either published, in production or not commenced. The long list, at the initial stage, also included other documents, which are not Local Plan evidence base documents. However, they were mostly documents which are relevant to the production of the Local Plan.
- 3.1.4 Technical experts/leads were then identified relating to individual technical topics, within Stantec, to undertake a review of different Thurrock evidence base documents. These reviews were informed by:
- Review of the individual evidence base documents; and,
 - Meetings with Local Plan leads and/or relevant officer leads in the Council.
- 3.1.5 Reviews of all Thurrock Local Plan evidence base documents is set out in **Appendix B1 – B8**, and summaries provided in this section below.
- 3.1.6 Following the review of the evidence base studies, the evidence base has regrouped studies according to topic, which is set out in **Table 3.1** below:

- *Right-hand column* – identifies where each evidence base review can be found in Appendices B1 – B8; and,
- *Left-hand column* – this sets out the revised evidence base topic regrouping, following the review of all Thurrock evidence base studies.

Table 3.1: Evidence Base Study Groupings and Relevant Appendix in this Report

| Evidence Base Study Topic Groupings | Appendix to this Report – further information on each evidence base report |
|---|--|
| Housing, including Traveller Sites | Appendix B.1 |
| Economy and Employment | Appendix B.2 (this includes Infrastructure, Delivery and Viability) |
| Transport | Appendix B.3 |
| Retail, Centres, Rural Settlements/Area Studies (SADFs) | Appendix B.4 – Centres Study (including retail); Rural Settlement Assessments; Spatial Area Development Frameworks (SADFs), Centre Health Check Assessment and Built Environment and Design (Design Charter and Codes) |
| Sports, Playing Pitches and Open Space | Appendix B.5 – Outdoor Sports and Leisure; Playing Pitches and Open Space and includes Green Belt Also included are Historic Assets and Scheduled Monuments, Minerals and Waste, Lakeside Vision and Placemaker |
| Flooding and Water | Appendix B.6 |
| Green Belt, Natural Environment, Landscape, Biodiversity and Green Space | Appendix B.5 – Green Belt Appendix B.7 – Natural Environment, Landscape, Biodiversity and Green Space |
| Climate Change and Energy | Appendix B.8 |
| Built Environment and Design | Appendix B.4 and B.5 |
| Infrastructure, Delivery and Viability | Appendix B.2 |
| Minerals and Waste | Appendix B.5 |

3.1.7 Reviews of Thurrock Local Plan evidence studies is provided in **Appendix B1 – B8**. A summary of the evidence base reviews, grouped by the reordered topic groupings, which reflect the left-hand column of **Table 3.1** above, is provided below.

3.2 Housing, including Traveller Sites

3.2.1 **Appendix B.1** provides a review of the following Thurrock Local Plan housing evidence base documents, including Gypsy and Traveller and Travelling Showpeople documents, as listed below:

- Interim Housing Site Assessment Study;
- Thurrock Housing Land Availability Assessment (HLAA);

- South Essex Strategic Housing Market Assessment Economic Impact Addendum;
- Thurrock Housing Needs Assessment;
- Housing Land Availability Assessment;
- Housing Delivery Strategy;
- Urban Capacity Study;
- Thurrock Gypsy and Traveller Accommodation Assessment (GTAA);
- Gypsy and Traveller and Travelling Showpeople Site Assessment; and,
- Buckles Lane Travelling Showmen Accommodation Assessment.

3.2.2 A Principal Planning Officer in the Local Plan team leads on Housing matters for the Local Plan. The Assistant Director Housing and Development leads the Housing and Economy team, which feeds into the Local Plan. The Place and Design Manager in Strategic Services leads on the Urban Capacity project. The Strategic Planning Manager in Strategic Services leads on Gypsy and Traveller and Travelling Showpeople development for the Local Plan.

Thurrock Housing Needs Assessment and Housing Land Availability Assessment Updates

3.2.3 The South Essex Housing Needs Assessment and Thurrock Housing Land Availability Assessment (HLAA) (Oct 2017) are both being updated.

- The updated Housing Needs Assessment has not commenced yet and no brief has been drafted, but it will be undertaken by Turley's.
- The HLAA update has been commenced. Both the Urban Capacity Study and Interim Housing Site Assessment Study need to be finalised first and fed into Placemaker. Then the HLAA can be finalised. It is all being completed in-house by Laura Pattison, with Call for Sites information being fed in by Zoe McAden.

3.2.4 Both the Housing Needs Assessment and HLAA documents need to be completed as soon as possible. This will then enable the evidence to help shape the housing scenarios and spatial strategy and feed into the Local Plan Viability report update and Infrastructure Delivery Plan.

Housing Delivery Strategy

3.2.5 The Local Plan team will produce a Housing Delivery Strategy, which will follow on from the Housing Needs Assessment and HLAA. There is currently no brief. This will need to establish what is happening for developers/householders, particularly on larger sites and identify any viability problems, yields and delivery strategy. This will feed into Local Plan policy, viability of the Local Plan and infrastructure requirements.

Gypsy and Traveller and Travelling Showpeople evidence documents

3.2.6 Thurrock Gypsy and Traveller Accommodation Assessment (GTAA) was completed by ORS in 2023. This study excluded needs assessment for Buckles Lane, which is an area of mostly unauthorised caravans (some Travelling Showpeople), all located within the Green Belt. It requires a small update due to the new definition for 'travellers' and change in Local Plan time period, such as possibly from 2027 to 2045. A separate needs assessment for Buckles Lane sites was produced by ORS, which also requires a small update.

- 3.2.7 The Gypsy and Traveller and Travelling Showpeople Site Assessment Study was completed by Stantec in April 2023. It assessed all existing traveller sites (except those in Buckles Lane, at the request of the Council) and Council owned land, for their potential for further authorised pitches and plots.
- 3.2.8 Buckles Lane sites contain up to approximately 800 caravans in the Green Belt, most of which are unauthorised. The Strategic Planning Manager in Strategic Services leads on behalf of the Local Plan team, as part of the corporate officers working group that is cross-departmental; and, the Council is planning internal/emergency services meetings to explore a strategy of how to deal with these sites. The Local Plan team should be involved in these discussions, to help inform Local Plan policies for the Buckles Lane area.
- 3.2.9 The Local Plan team will need to match needs against potential sites identified, for both housing and traveller sites, to inform the scenarios and location of sites, to achieve sustainable development in Thurrock.

3.3 Employment and Economy

- 3.3.1 **Appendix B.2** provides a review of the following Thurrock Local Plan employment and economy evidence base documents, as listed below.
- Economic Development Needs Assessment (EDNA) (Update);
 - Employment Land Availability Assessment (ELAA) Update; and,
 - Freeport Alignment Scoping Study.

Employment Land Availability Assessment and Economic Development Needs Assessment

- 3.3.2 The Employment Land evidence is being updated, but there is a slight risk on the supply side assessment (ELAA), as the current evidence does not provide the Council with the appropriate level of information on suitable employment sites to meet projected growth. The implication of this is that the Council does not currently have sufficient information in the ELAA evidence base to make decisions on which employment sites should be allocated in the Local Plan. It is therefore a priority to coordinate the ELAA consultant LSH and EDNA consultant (Ekosgen) to ensure that the ELAA provides sufficient supply side information on employment sites for both the EDNA to review, and from that the Council to determine which employment sites should be included in the Local Plan.

Freeport Alignment Scoping Study

- 3.3.3 This study is being undertaken by Ekosgen and a brief has been agreed. Work is yet to commence and should be completed by September 2024, subject to procurement.

3.4 Transport

- 3.4.1 **Appendix B.3** provides a review of the following Thurrock Local Plan transport evidence base documents. Reviews have been undertaken of 24 indicated items of evidence intended to form part of the transport evidence base for the Local Plan.
- 3.4.2 Of those, six have not yet been commissioned or started. Eleven documents are noted as finalised. The dates of those documents range from 2021 to 2024. The remaining seven documents are not yet completed. Eight different consultant companies have been involved in preparing the documents.

- 3.4.3 The review has included five meetings with Thurrock Council officers and consultants. Officers have been engaged with from Strategic Transport and Delivery teams. The reviewers' views are that some of the indicated evidence base is not required for the robust development of a sound Local Plan.
- 3.4.4 A key aspect was the need for strengthened collaboration and coordination between the evidence and strategic tasks being carried out by different teams within the Council. That approach would ensure that the evidence, strategy and policy generated by the Council complements and supplements the broader strategy for movement of people and goods; connectivity by all modes of travel for all purposes; and the pursuit of sustainable environmentally sound travel within the Borough and its external linkages.
- 3.4.5 Evidence, such as the Transport Vision document, continue to be valid, but should be revisited to ensure they align with changes in growth scenarios. Some elements of evidence that have been prepared are now becoming dated, due to a variety of reasons including changes in the direction of the Local Plan, the impact of Covid-19 on long-term travel patterns and changes in planned development and infrastructure both within and outside Thurrock. For these items, a decision should be taken as to whether this evidence: reflects a point in time; was useful to support Regulation 18 but will be superseded by other evidence going forwards; or, whether there is desire to update this work.
- 3.4.6 The transport evidence does not generally reflect the proposals for the Lower Thames Crossing (LTC). The stated position is that evidence base would be adjusted were the LTC Development Consent Order (DCO) be granted.
- 3.4.7 The Local Development Order (LDO) for London Gateway DP World and Thames Freeport are recognised within sections of the evidence, but the consistency should be refreshed.
- 3.4.8 A fundamental workstream to support the Local Plan and the preparation of the Local Plan Transport Assessment, going forward, is the Strategic Transport Model, which is incomplete. At present, from the meetings held with Council officers, there are differences of opinion between departments whether the modelling commission includes the preparation and assessment of scenarios to support selection of a preferred option (Regulation 19). The original Instructions to Tenderers clearly stated the tasks to be included, which included forecasting and local plan scenarios.
- 3.4.9 At present, the model is not ready to inform the Regulation 19 consultation, should it go ahead under the current Local Development Scheme (LDS) timetable, which is most unlikely until at least Spring/Summer 2025. There are multiple parties involved in the modelling (Local Plan officers, Strategic Transport officers, City Science, and Ridge and Partners LLP), and there are elements of confusion and conflicting/unclear scope that appear to be arising as a result of this. Updates to the forecast base models, definitely required to support the Local Plan, appear to be deemed out of scope, and therefore are not currently accounted for in City Science's workstreams or programme, leading to significant uncertainty as to the realistic timetable for City Science to complete the modelling work required to support the Local Plan. Ownership of the model and responsibility for decision-making with regards to its development and use in the Local Plan needs to be coordinated and agreed within the Council with collaboration between teams. Without the model, preparation of a sound evidence base for Transport will be extremely challenging and not robust and therefore this is a significant risk to the Local Plan.
- 3.4.10 The Local Plan is inextricably linked to Transport Planning in Thurrock. Therefore, there needs to be political buy-in to the Local Transport Vision, as this will frame the Local Plan Transport Assessment. Furthermore, it is important that the Local Transport Plan 4 (LTP4) is progressed, in order that it aligns effectively with and informs the Local Plan; and, that the Local Plan can be utilised to safeguard land as required to deliver transport schemes that are required in Thurrock (which may or may not be directly linked to new development). Delaying work on the LTP4, until the DfT publishes updated guidance on its preparation, risks the ability

of the Council to deliver an ambitious and effective LTP4 and could mean that land required for infrastructure is not available. At present, there is confusion as to the scope of the LTP4, which (in the absence of updated DfT guidance) would be expected to include *'both policies (i.e. the strategy and the type of measures which contribute to that strategy) and an implementation plan for those measures'* (DfT Guidance on Local Transport Plans, July 2009). The Thurrock Transport Strategy is therefore expected to form part of the LTP4; however, the detailed infrastructure and implementation plans are yet to be commenced.

- 3.4.11 Overall, there has been a historic lack of clarity and coordination over roles and responsibilities in relation to transport planning evidence, to support and inform the Local Plan development. That position would be improved through enhanced communication and engagement between the Local Plan and Transport Planning teams within the Council. Coordination and collaboration must be renewed, and it is recommended that an initial workshop between all parties in order to facilitate this and define the detailed responsibilities, scope and programme of transport work to support the Local Plan. A historic lack of overall coordination and direction appears to be resulting in limited understanding or agreement, in terms of the requirements for Transport evidence to support the Local Plan.

3.5 Retail, Centres and Rural Settlements/Area Studies

- 3.5.1 **Appendix B.4** provides a review of the following Thurrock Local Plan evidence base documents, as listed below.

- Rural Settlement Assessments (**Appendix B.4**);
- Centres Study (including Retail and Commercial Leisure Needs Assessment) (**Appendix B.4**);
- Thurrock Town and Local Centre Health Check Assessment (**Appendix B.4**);
- Spatial Area Development Frameworks (**Appendix B.4**); and,
- Lakeside Vision (**Appendix B.5**).

Rural Settlement Assessments

- 3.5.2 The Rural Settlement Assessments assess the heritage constraints in the rural areas as they are technical heritage assessments. The heritage evidence is unlikely to change and therefore these documents are considered to be up to date, so there is no further work required to these documents.

Centres Study (including Retail and Commercial Leisure Needs Assessment)

- 3.5.3 The Centres Study (this will include a Retail and Commercial Leisure Needs Assessment) has not commenced yet and there is currently no brief for this work. To undertake the necessary surveys to support this study will take time so it is important that it is progressed as soon as possible. A corporate steer is required as to what it shall include, for example, regeneration. Clarity is also required as to who should lead this work, as there is capacity issue within existing staff.

Thurrock Town and Local Centre Health Check Assessment

- 3.5.4 Update Thurrock Town and Local Centre Health Check Assessment is required, as the latest version is minimal. Grays and Lakeside centres will be key to this study. Currently there is no brief or project plan for this Assessment, which will either be produced by the Local Plan team or consultants.

Spatial Area Development Frameworks

- 3.5.5 The Spatial Area Development Frameworks, whilst these will be good to have, they are not essential evidence to support the Local Plan process. They have not been commissioned to date and there is no brief for this work. They can follow at a later stage, as they could be adopted as Supplementary Planning Documents (SPDs).

Lakeside Vision/Masterplan

- 3.5.6 Lakeside Vision/Masterplan was on the evidence base list at the beginning of this project. The previous Place and Design Manager in Strategic Services has confirmed that a masterplan is not necessary for Lakeside, as the area is built out and there are no plans to undertake this piece of work at present. However, it was confirmed that there is a need to improve the public realm at Lakeside, which could be informed by a '**Lakeside Public Realm Improvement Plan**'. There is currently no resource or finance allocated to this project. This project is not essential to the Local Plan. However, any public improvement plan would help to regenerate Thurrock, bringing more people and money into the area and therefore help to improve Thurrock for people living, working and visiting the Borough.

3.6 Sports, Playing Pitches and Open Space

- 3.6.1 **Appendix B.5** provides a review of the following Thurrock Local Plan evidence base documents, as listed below.

- Open Space Assessment Study;
- Playing Pitch Strategy; and,
- Indoor Leisure and Sports Facilities Assessments.

Open Space Assessment Study

- 3.6.2 The draft brief has been prepared for the Open Space Assessment Study and amended following review and can be used to appoint LUC to undertake the work and it is aimed that this work will be completed by September 2024.

Playing Pitch Strategy and Indoor Leisure and Sports Facilities Assessments

- 3.6.3 The Playing Pitch Strategy and Indoor Leisure and Sports Facilities Assessments are two separate evidence base studies, although now combined under one Brief. The same consultant will be procured for both studies. Neither study has commenced, but a draft combined Brief has been prepared and reviewed and is undergoing amendments. It is currently being led by the Strategic Planning Manager in Strategic Services, who is seeking to pass on these studies to a Local Plan team member, after he has commissioned consultants. Consultants will be selected from the Sport England consultants list. This combined study has an estimated programme of 12 months, which would need to be confirmed with Sport England.

3.7 Flooding and Water

- 3.7.1 **Appendix B.6** provides a review of the following Thurrock Local Plan flooding and water evidence base documents, as listed below.

- Thurrock Level 1 Strategic Flood Risk Assessment (SFRA);
- Environment Agency Review of Level 1 Paper;

- Thurrock Strategic Flood Risk Assessment – Level 2 SFRA;
- Stanford-le-Hope Surface Water Modelling-Scope Change Authorisation; and,
- Thurrock Water Cycle Study Scoping Report and Thurrock Water Cycle Study – Detailed Study scope.

Thurrock Level 1 Strategic Flood Risk Assessment (SFRA)

- 3.7.2 The Thurrock Level 1 Strategic Flood Risk Assessment (SFRA) was updated in January 2024 to incorporate changes in legislation (NPPF 2021 and PPG 22), latest climate change guidance and updated catchment/ flood risk modelling data.
- 3.7.3 Future monitoring and updates will be required following major developments or legislative changes. Consultation with the Environment Agency (EA) is required to understand the latest Thames Estuary 2100 Plan impacts. Gaps have been identified to feed into baseline evidence required for the SFRA Level 2 scope:
- Areas of Critical Drainage (AoCD);
 - Natural Flood Management / NBS plus Wetlands;
 - Integrated Catchment model for Stanford-le-Hope;
 - Green Infrastructure Strategy; and,
 - Groundwater Flooding and Supporting Models/Data.

Environment Agency Review of Level 1 Paper

- 3.7.4 The EA have reviewed the SFRA Level 1 prior to the publication of the latest SFRA Level 1 in January 2024. The EA suggested strengthening the Flood Mitigation section in line with the NPPF that requires Flood Resistant and Resilient measures and also suggested residual risk is considered early in the design process. The changes have been incorporated into the most recent revision of the SFRA Level 1 work.
- 3.7.5 The EA helpfully describes that the TE2100 Plan takes an adaptive pathways approach, and therefore does not yet define a final option for replacing or upgrading the current Thames Barrier. It also suggests that the SFRA should add text to secure land likely to be needed for all long-term estuary wide options for flood risk management in the Thames Estuary. The land allocations for proposed and potential interventions needs to be clearly mapped and regularly updated in an accessible format to enable consideration in the Local Plan.
- 3.7.6 The EA have also suggested inclusion of a reference to Schedule 3 and its implications. DEFRA are expected to provide an update to inform the impact of Schedule 3 / SuDS adoption legislation changes.
- 3.7.7 Gaps have been identified to feed into SFRA Level 2 scope:
- Review the Thurrock and Essex Green Blue Infrastructure strategies. Coordination meeting required with Ecologist/ Habitats/ Landscape officers; and,
 - Consult with Emergency Planning Team and Emergency services. Mapping of evacuation routes and safe zones.

Thurrock Strategic Flood Risk Assessment – Level 2 SFRA

- 3.7.8 The Thurrock SFRA Level 2 Scope by AeCom has been reviewed. Two gaps have been identified:
- Maps of flood extent for the River Thames overtopping and breach scenarios are included; this is described as '*flood extent and/or hazard rating*'. Clarity is needed to confirm that *both* flood extent and hazard rating will be included. These maps should also be accompanied with a commentary based on interrogation of the source data to give an indication of flood depths and velocities.
 - It is not clear what evidence developers should use to identify key groundwater flow routes. It will be helpful to identify any groundwater modelling studies that have been carried out to date in the Thurrock area. The Level 2 SFRA should include an indication of key groundwater flow routes, based on available data.
- 3.7.9 In addition to these two gaps, additional gaps have been identified following review of the SFRA Level 1 and the EA Review. Furthermore, the Stanford-le-Hope Surface Water Modelling report will also feed into the evidence required for the SFRA Level 2.
- 3.7.10 There are a number of issues and baseline data requirements that overlap with the requirements for the Water Cycle Study: Detailed Study.

Stanford-le-Hope Surface Water Modelling-Scope Change Authorisation

- 3.7.11 The Stanford-le-Hope Surface Water Flood Alleviation scheme is a joint partnership project between the Environment Agency and Thurrock Council to help lower the risk of flooding from pluvial and fluvial sources in Stanford-le-Hope. An Initial Assessment undertaken in 2018/19 identified the risk to 42 properties from surface water flooding.
- 3.7.12 AeCom proposed to use the existing direct rainfall model that was developed for the Thurrock SWMP to ascertain whether provision of flood storage on future development sites surrounding Stanford-le-Hope could reduce flooding in the town. As well as identifying flood storage potential in surrounding development land, it is expected to demonstrate benefits that could be realised through retrofit of SuDS in the town.
- 3.7.13 Due to the influence of the railway, it will be important to obtain railway survey data as well drainage asset information, including culverts. This information must be requested from Network Rail.
- 3.7.14 The Surface Water modelling work will begin in May 2024. Depending on the results and recommendations, further work may be required to investigate retro-fitting SuDS features within the town. The modelling report will feed into the evidence base for the Level 2 SFRA.

Thurrock Water Cycle Study Scoping Report and Thurrock Water Cycle Study – Detailed Study scope

- 3.7.15 Both the Thurrock Water Cycle Study Scoping Report and Thurrock Water Cycle Study – Detailed Study scope, were published in March 2024.
- 3.7.16 The Scoping Study Report outlines key policy drivers for the WCS, including national and local policies, notably:
- Water Environment Water Framework Directive (WFD) Regulations 2017;
 - The Conservation of Habitats and Species Regulations 2017 (as amended);

- The Environment Act (2021);
- The Levelling Up and Regeneration Act 2023;
- Local Policy CSTP25 – Addressing Climate Change; and,
- Local Policy CSTP27 – Management and Reduction of Flood Risk.

3.7.17 The AeCom scope for the Detailed Study suggested a 20-week program to complete the work, however, more time may be needed due to some missing and emerging evidence and consultations required.

3.7.18 The potential impact of LTC, other major non-residential developments, housing growth and employment strategy and transport modelling need to be understood in advance of commencing work. In addition to these uncertainties, other gaps in evidence have been identified:

- Agree scope of Mardyke joint study with Brentwood;
- Review of the National Storm Overflows plan and consultation with water companies;
- Water stressed area: adaptive measures. Consult with Essex County Council (ECC) and water companies to understand local policy impacts on realistic delivery of water neutral targets;
- Nutrient Neutrality +NBS. Consult with the EA, Natural England (NE) and water companies to understand preferred locations for NBS;
- Review the DEFRA position for supply of water to non-residential is set out in ‘Integrated Plan for Delivering Clean and Plentiful Water’;
- Awaiting ESW final Water Resources Management Plan (WRMP);
- Coordination meeting required with Ecologist/ Habitats/ Landscape officers for related issues Water Quality Status and Habitats impact and CSOs; and,
- Consult with EA on abstraction licenses: review long term status.

3.8 Green Belt, Natural Environment, Landscape, Biodiversity and Green Space

3.8.1 **Appendices B.5 and B.7** provides a review of the following Thurrock Local Plan evidence base documents, as listed below.

- Strategic Green Belt Assessment;
- Detailed Green Belt Assessment;
- Landscape Character Assessment;
- Biodiversity Net Gain Guidance;
- Local Nature Recovery Strategy;
- Thurrock Green and Blue Infrastructure Strategy; and,
- Thurrock Local Wildlife Site Review.

Green Belt

- 3.8.2 Thurrock Strategic Green Belt Assessment (Stages 1a and 1b) was produced by Stantec and Enderby Associates in January 2019. This report is still relevant and robust. It will feed into the more detailed Green Belt assessment, which is necessary to inform the right locations for further development and any mitigation that is required.
- 3.8.3 Arup have been commissioned to undertake the Detailed Green Belt Assessment. However, the Assessment has been put on hold by the previous Local Plan, as the list of sites being considered for the Local Plan is currently too long. The project should recommence when a preferred long list of potential development sites is identified. There needs to be a new Local Plan lead to manage the project and consultants, to ensure the scope and programme is adhered to. Arup estimate the project should take between 5 – 6 months to complete. The previous Local Plan Manager identified there is potentially extra scope to this project, to assess whether villages should be removed from the Green Belt, which is currently not part of Arup's current commission. If included in their commission, this would incur an additional fee, which needs to be explored by the Council. A purchase order was raised for the Arup work, though the previous Local Plan Manager questioned whether the purchase order has expired (or not), so the Council should check whether the monies is still ringfenced as part of the Local Plan Reserve budget.

Landscape Character Assessment and Local Wildlife Site Review

- 3.8.4 The Landscape Character Assessment and Thurrock Local Wildlife Site Review are currently considered to be complete and up-to-date and do not require further work in the short-term.

Biodiversity Net Gain Guidance

- 3.8.5 Biodiversity Net Gain Guidance is primarily a Development Management priority and is being produced by the Government (now possibly subject to change in view of the General Election on 4 July 2024). It is required in the short-term and so could be included within the Local Plan timetable subsequently.

Local Nature Recovery Strategy

- 3.8.6 The Local Nature Recovery Strategy is being led by ECC. Consultation on the draft strategy will take place during the summer 2024 with the aim of completing the document by end of 2024. Thurrock is a Supporting Authority and will be formally consulted.

Thurrock Green and Blue Infrastructure Strategy

- 3.8.7 The Thurrock Green and Blue Infrastructure Strategy was revised and updated in 2023. The main report is generally sound but should be updated to take account of changing policy. The main issue, however, is the lack of clearly identified projects and programmes which need to be developed to help inform the emerging Local Plan. Currently there is no timetable to carry this out.

3.9 Climate Change and Energy

- 3.9.1 **Appendix B.8** provides a review of the following Thurrock Local Plan climate and energy evidence base documents, as listed below.
- Climate Change Strategy;
 - Energy Strategy; and,
 - Energy Needs and Opportunities Study or Local Area Energy Plan.

3.9.2 **Appendix B.8** has identified that the following needs to be given consideration within the evidence base:

- A number of relevant policy documents have been published since the Local Plan evidence documents were prepared, including the Governments Carbon Budget Delivery Plan and the Third National Adaptation Programme;
- The impact of major schemes, including Lower Thames Crossing and Thames Freeport. These schemes are expected to influence energy demand and carbon emissions, both directly and through economic growth, within Thurrock. Consideration should therefore be given to the impact of these on Thurrock's net zero targets and whether this would subsequently affect climate policies within the Local Plan;
- An Energy Needs and Opportunities Study or Local Area Energy Plan (LAEP) is missing and the growth scenarios within the Energy Strategy are out of date. The production of a LEAP, using an updated Housing Needs Assessment, will be required to bring the energy strategy in line with the emerging Local Plan.
- While national climate impacts and the importance of climate action is set out with the climate change strategy, climate hazards and risks for Thurrock have not been identified. It is therefore recommended that a high-level risk assessment is undertaken to identify and support climate of adaption measures within the Local Plan.

3.9.3 The strategies identify the need for public consultation on these documents, however, there has been no evidence if this has taken place or not. Public consultation should be undertaken and take into account any feedback received through this process.

3.10 Built Environment and Design

3.10.1 **Appendix B.4** provides a review of the following Thurrock Local Plan built environment and design evidence base documents, as listed below.

- Draft Design Charter;
- Borough-wide Design Codes / Guide;
- Assessment of Settings – Thurrock Scheduled Monuments; and,
- Comprehensive Historic Environment.

Design Charter

3.10.2 The Draft Design Charter requires some minor updates that need to be completed prior to the Boroughwide Design Guide. Some updates could be made in terms of making reference to planned infrastructure, logistics and growth. Thurrock's characteristics (Section 2) appears to omit its importance for logistics and does not refer to *'the impacts of LTC or Norwich to Tilbury DCO projects'*; and *'For its four Design Principles (Section 3), it appears that the importance of housing and employment growth and design is omitted'*. **Appendix A** has a further set of comments on this document in Sections 4.72 – 4.79. DLA would need to be commissioned to amend the document with these small-scale amendments.

Boroughwide Design Codes / Guide

3.10.3 Once the Design Charter has been completed, it will then be necessary to commission the Borough-wide Design Guide, which will follow on from the Charter. There is no brief for this work, but it is important that it is undertaken and forms part of the evidence base for the Local Plan and could be undertaken in-house by the Place and Design team.

Assessment of Settings – Thurrock Schedule Ancient Monuments

- 3.10.4 The ‘*Assessment of Settings – Thurrock Schedule Ancient Monuments*’ has been completed to date. There has also been some historic environmental work undertaken, as part of the Rural Settlements Studies work, which was completed by the team led by the Place & Design team in Strategic Services.

Comprehensive Historic Assessment

- 3.10.5 A Comprehensive Historic Assessment has been identified, by the Local Plan team, as an evidence base study, which needs to be commenced and produced. There is currently no Brief and no Local Plan lead for this project. It is anticipated that Place Services, at Essex County Council (ECC), would undertake this project. At this stage, there has been no discussions with either Historic England or Place Services. These discussions should commence as soon as possible, to start the dialogue and understand the scope of work and programme. Strategic Services department, at the Council, should be involved in these discussions, jointly with the Local Plan lead.

3.11 Infrastructure, Delivery and Viability

- 3.11.1 **Appendix B.2** provides a review of the following Thurrock Local Plan infrastructure, delivery, and viability evidence base documents, as listed below.

- Infrastructure Delivery Plan (IDP) (Baseline);
- Infrastructure Delivery Plan (Full Report); and,
- Whole Plan Viability Assessment.

Infrastructure Delivery Plan

- 3.11.2 The IDP evidence appears appropriate as it is split between two phases, Phase 1 (feasibility of infrastructure based on high level growth trajectory) and Phase 2 (detailed IDP), but the lack of information on growth and development sites creates a risk of abortive work from Phase 1 and therefore high costs for the Council.
- 3.11.3 The first part of Stage 1 is currently underway based on a range of scenarios developed by the Local Plan team. Stantec are unsure if these scenarios are suitable or evidence-based, which if true would involve abortive work in understanding infrastructure needs from such scenarios. The recommendation to pause this work is under consideration in June 2024.

Whole Plan Viability Assessment

- 3.11.4 The viability evidence will need to be updated once there is certainty on policies and growth locations. However, there is a significant gap in the retail evidence and Town Centres planning (especially Lakeside) that needs to be addressed urgently.
- 3.11.5 Following discussion with Local Plan officers and other departments within the Council, there is a concern about viability of housing sites, particularly in and around urban areas, such as Grays, which will require further investigation. Given the importance of identifying viable and deliverable housing in existing urban areas within local development plans, this viability work should be performed as soon as possible to enable mitigation strategies to be developed, if required.

3.12 Minerals and Waste

- 3.12.1 **Appendix B.5** provides a review of the following Thurrock Local Plan minerals and waste evidence base documents, as listed below.
- Minerals Safeguarding Area Study; and,
 - Waste Arisings and Capacity Study.
- 3.12.2 Thurrock Council is a unitary authority and has a statutory duty relating to minerals and waste. There is no current Minerals and Waste Local Plan officer and there is no Thurrock Minerals and Waste Local Plan.
- 3.12.3 The Strategic Planning Manager in Strategic Services currently leads on minerals and waste planning for the Local Plan. The Strategic Planning Manager in Strategic Services has confirmed that no work has commenced on a Thurrock Minerals and Waste Local Plan and that there is no current funding, resources or programme to produce one.
- 3.12.4 There are spatial elements of mineral and waste planning, which will need to feed into the 'planning' Local Plan, as set out below.

Minerals Safeguarding Area Study

- 3.12.5 Mineral Safeguarding Area Study is needed to ensure other Local Plan allocations, e.g. housing and employment, are not allocated where mineral deposits need to be safeguarded. The Strategic Planning Manager in Strategic Services needs to procure consultants to complete the work, which should take 2-3 months.

Waste Arising and Capacity Study

- 3.12.6 The Strategic Planning Manager in Strategic Services aims to commence the Waste Arising and Capacity Study in the next 12 months. Initial tasks will be to set out the baseline and planning history, which will commence in 2024, although there is no firm programme for that work at present. Consultants will then undertake the Waste Arisings and Capacity and will be researching waste flows, needs for waste for housing growth, investigate various streams and capacity, then what type of needs is required. Richard confirms that currently the Waste Arising and Capacity Study will not inform this Local Plan and will inform the next one.

3.13 Placemaker – Tool for Sites

- 3.13.1 Placemaker is not part of the evidence base. However, it is an important tool being used by the Local Plan team and other departments in the Council, which requires contract management and a Local Plan lead. The current contract is with Urban Intelligence and the 3-year software contract started on 30 September 2022. The previous Local Plan Manager managed the Placemaker contract for the Local Plan team and the Council as a whole.
- 3.13.2 All officers in the Council are able to use Placemaker, at no extra cost to the Council. It is recommended that more than 1 person in the Local Plan team is able to use the package, to retain resilience and knowledge within the Council, as it is used for all site assessment work.
- 3.13.3 It is important that any evidence base report which is site based is fed into Placemaker, so that all site information is on one digital platform. Therefore, all Briefs for all new evidence base need to include capacity for either consultants or Local Plan officers to enter information from the evidence into Placemaker – for Briefs both retrospectively and in the future. This needs to be undertaken in the most efficient way possible, to ensure there is no duplication of work and is built into the brief and project plan for each evidence base study.

3.14 Recommendations

3.14.1 This section sets out the recommendations from the review of Thurrock's Local Plan evidence base progress.

Evidence Base Work Programme

3.14.2 Thurrock Local Plan evidence base progress and initial work programme is set out in **Table 3.2** below, which has been informed by Stantec's review of:

- All Local Plan evidence studies, as set out in this report and **Appendices B.1 – B.8**;
- PAS Report (**Appendix C**);
- Relevant Local Plan NPPF policies (**Appendix C**);
- 3 local authority adopted Local Plan best practice examples (**Appendix C**); and,
- Discussions with the Chief Planning Officer, Local Plan officers and other Council officers.

3.14.3 **Table 3.2** below sets out a total of **51 evidence studies**:

- The list of evidence documents relevant to Thurrock Council, grouped by technical topics;
- Identifies the priority of commencing/pausing each of the evidence base documents;
 - **Purple (9)** – Priority to commence/continue now
 - **Grey (2)** – To be paused temporarily (if necessary), but only once a broad exit plan has been prepared
 - **Red (14)** – 2nd priority following Purple. Do not have to wait for Purple ones to be completed, before Red ones commenced
 - **Orange (15)** – 3rd priority following Red. Do not have to wait for Red ones to be completed, before Orange ones commenced
 - **Green (11)** – Completed, but need to check if any further actions required
- Current status of the evidence base report, e.g. if the report has commenced, has a Brief, in draft or has been completed, and whether it needs updating;
- Current funding situation, sourced from the PID (PID) Working Draft/Local Plan reserve, provided by the Local Plan Manager;
- Timeline for completing each evidence base report; and,
- Further relevant commentary, which should be taken into account.

3.14.4 The evidence base studies should be developed in two phases: **Phase 1** – to inform the scenarios for growth and start to develop the draft Preferred Option for growth; and **Phase 2** – evidence that is developed based on the scenarios for growth and firms up the final Preferred Option for growth – as set out below.

3.14.5 This is explained graphically in **Figure 5.1** below, which sets out the need for two additional Technical Papers – these would clearly set out how the Council derived the growth scenarios and spatial options used in the IPD; and, how it will derive the growth scenarios and spatial options for the Regulation 19 Local Plan and what evidence data was used. The diagram shows this by setting out sequentially the process from the IPD to preparing growth scenarios/spatial options that are robust and that can be assessed and then developed into a Preferred Option for growth to be used in the Regulation 19 Local Plan. The two Technical Papers required are:

- **Technical Paper 1** – retrospectively to demonstrate how the 4 growth scenarios and 5 spatial options and, indeed, the settlement proposals were derived and what evidence (if any) or reasoning was used; and,
- **Technical Paper 2** – going forward, to determine the critical evidence studies (together with the vital and up-to-date input data needed) to create robust and defensible growth scenarios and spatial options. This will set out how the growth scenarios and spatial options were derived from evidence; and then, how the Preferred Options was derived from both evidence and the ongoing IIA assessment work.

3.14.6 The list of Local Plan evidence base studies in the two phases, in terms of programme, are set out below and is set out in Table 3.2 and Figure 5.1 below.

- **Phase 1:** evidence base studies which need to be produced to inform the housing/employment growth scenarios/spatial options and Preferred Option for growth. These are all mainly development type land (including housing and employment) availability studies and needs assessments, as well as all the baseline environmental impact assessment studies. These studies do not need the growth scenarios/options and preferred option for growth to commence and complete these studies. Therefore, they can all be started now and should be completed as soon as possible;
- Then, develop the housing/employment growth scenarios/spatial options and Preferred Option for growth; and,
- **Phase 2:** evidence base studies which need the growth scenarios/spatial options and Preferred Option for growth in order to complete the studies. **The full list of these studies are highlighted in yellow in the left-hand column in Table 3.2 below and in the Local Plan Programme (Table 9.1).** In some instances, many of these studies can commence before the growth scenarios/spatial options and Preferred Option for growth are finalised, maybe few months before, as many will need to get started, e.g. getting baseline information, making initial contact with other organisations and officers. Then, once the growth scenarios/spatial options and Preferred Option for growth are finalised (but importantly using the ongoing IIA assessment work), the consultants or officers begin as soon as possible. This will help to not extend the Local Plan Programme. The key to starting on these evidence base studies is going to be the Transport Modelling, which has the longest amount of time to be completed (9 – 12 months from now until Spring 2025, approximately).
- **Some evidence studies relate to both Phase 1 and Phase 2 and these studies are highlighted in blue below in the left-hand column in Table 3.2 and in the Local Plan Programme in Table 9.1.**

3.14.7 It should be noted that Table 9.1 sets out all known dates for evidence studies to be started and completed and then approximate dates for the evidence studies yet to be started. As these are approximate it is vital that this revised Local Plan Programme is updated monthly as new information becomes available.

Table 3.2: Thurrock Local Plan Evidence Base Progress and Initial Work Programme (also refer to Table 9.1)

| Evidence Base Document Title | PRIORITY (Purple) Essential (Red) Necessary (Amber) Completed (Green) + Officer/Team Lead | Current Status | Current Funding Situation (Source: PID Working Draft/ Local Plan reserve) | Timeline to Completion | Commentary |
|--|---|--|---|--|---|
| HOUSING, including Travellers Sites | | | | | |
| Housing Strategy 2022-2027 | Ewelina Sorbjan | Complete | n/a | n/a | No action required. |
| Housing Needs Assessment (HNA) Update | Laura Pattison | June 2022 is current version. Update not started, awaiting Brief. Project Plan required. | £35,000 (Local Plan reserve FY 24/25) | Sept/Oct 2024 – Jan 2025 (subject to procurement, 3 months to complete). | Turley's need to be commissioned. Delayed by 3 months to assess national planning policy |
| Housing Land Availability Assessment (HLAA) | Laura Pattison | Not started. Brief & Project Plan required for internal use. | Internal | Nov/Dec 2024 (subject to Brief & Project Plan agreed in May 2024). | HLAA being done in 'Placemaker'. Three key inputs: - Urban Capacity Study (June 2024) - DLA Interim Housing Site Assessment Study (June 2024) - Call for Sites / IPD site info (May 2024) - Likely to require viability testing (external commission to test deliverability of sites) |
| Housing Delivery Strategy / Trajectory | Laura Pattison | Not started. Brief & Project Plan required for internal use. | Unknown, but internal | Commence late 2024/completion April 2025. | Local Plan to produce. Key inputs are: - Updated HLAA - Local Plan Viability Update |
| Thurrock Gypsy and Traveller Site Assessment Study | Richard Hatter | Complete | n/a | n/a | Stantec Needs should be compared to sites – once GTAA updated. |
| Thurrock Gypsy and Traveller Accommodation Assessment (GTAA) | Richard Hatter | Completed, but requires small update. Commissioned and commenced | £30,000 (Local Plan reserve FY 24/25). | Sept 2024 (potentially subject to procurement and | ORS |

| Evidence Base Document Title | PRIORITY (Purple) Essential (Red) Necessary (Amber) Completed (Green) + Officer/Team Lead | Current Status | Current Funding Situation (Source: PID Working Draft/ Local Plan reserve) | Timeline to Completion | Commentary |
|--|---|--|---|---|--|
| | | | | then 3 months to complete). | Complementary work to the site assessment work (which was completed April 2024). |
| Buckles Lane Gypsy and Traveller Accommodation Assessment (GTAA) | Richard Hatter | Commissioned and commenced | £25,000 (Local Plan reserve FY 24/25). | Sept 2024 | ORS?? Needs to be updated. Requires planning solution – 800 caravans in Green Belt (mostly unauthorised). |
| EMPLOYMENT & ECONOMY | | | | | |
| Economic Development Needs Assessment (EDNA) Update | Laura Bage | March 2023 current version. Update started. | £30,000 (Local Plan reserve FY 24/25). | Dec 2024 – Feb 2025 (subject to procurement, 3 months to complete). | Work being undertaken by Ekosgen. Delayed by 3 months to assess national planning policy. Requires outputs from the HNA Update, ELAA Update and Freeport Study |
| Freeport Alignment Scoping Study | Laura Bage | Brief agreed. Commissioned. | £5,000 (Local Plan reserve FY 24/25). | Sept 2024 (subject to procurement). | Work to be undertaken by Ekosgen. |
| Employment Land Availability Assessment (ELAA) Update | Laura Bage | April 2023 current version. Not started. Brief completed. Updated proposal, including Project Plan required. | £30,000 (Local Plan reserve FY 24/25). | Oct 2024 (subject to procurement, 3 months to complete). Work to be completed approximately same time as EDNA, as ELAA information will feed into EDNA. | Work to be undertaken by LSH. |

| Evidence Base Document Title | PRIORITY (Purple) Essential (Red) Necessary (Amber) Completed (Green) + Officer/Team Lead | Current Status | Current Funding Situation (Source: PID Working Draft/ Local Plan reserve) | Timeline to Completion | Commentary |
|---|--|---|--|---|---|
| Thurrock Skills Plan 2022 | Housing and Development Team and Laura Bage | Complete. | n/a | n/a | No action required. |
| TRANSPORT | | | | | |
| Local Transport Vision Update | Strategic Transport team | Complete Feb 2023. Not started. No Brief yet. Project Plan required. | £5,581.71 (Local Plan reserve FY 24/25). | Late 2024 (subject to procurement and any subsequent consultation). | Need to incorporate up-to-date transport, housing and employment. |
| Strategic Transport Model | Navtej Tung & Luis Herrera Ridge acting as Intelligent Client on behalf of Council to ensure model is suitable for LP use | Stage 1 complete (2019 base models complete). Stage 2 (Future base models underway, but not suitable for Local Plan scenario testing. Data collection and model update to refresh the base and forecast models to be suitable for Local Plan scenario testing is not yet started, and the way forward not agreed (Model Refresh). | £254,718.75 (Local Plan reserve FY 23/24-25/26) Although, the additional sum required for the Model Refresh and Scenario Testing accounting for the existing contract sums is £72,810 | Spring - Autumn 2025. | Data collection to be done in Sept 2024 (neutral month). Updated base and forecast models then to be completed and to include LTC, Freeport and other committed development. Stage 2 model to inform and be informed by transport assessments for Local Plan & to be used for scenario testing. |
| Thurrock Transport Strategy (2013-2026) and its SEA | Navtej Tung | Current version, Oct 2022 (Mott McDonald). Update commenced internally (current draft version is 8). Project Plan? | £30,000 (Local Plan reserve FY unknown). | Spring 2025. | Update being done internally, although LUC will need to review and update the SEA |
| Local Plan Transport Assessment | No Local Plan lead | Commissioned and a programme of works agreed. Stage 1 – site connectivity study. Stage 2 - Multi-modal Travel Demand Assessment. | £115,000 (Local Plan reserve FY 24/25) | Autumn/Winter 2025 | Work being undertaken by Ridge and 30% undertaken. To be applied to previously agreed Local Plan team scenarios and future preferred option. Linked to development of housing and employment needs and |

| Evidence Base Document Title | PRIORITY (Purple) Essential (Red) Necessary (Amber) Completed (Green) + Officer/Team Lead | Current Status | Current Funding Situation (Source: PID Working Draft/ Local Plan reserve) | Timeline to Completion | Commentary |
|---|---|--|---|------------------------|---|
| | | <p>Stage 3 - Reg 19 Multi-Modal Modelling.</p> <p>The transport model is needed for 4 critical uses:</p> <ol style="list-style-type: none"> 1 Evaluate Local Plan land use and infrastructure proposals 2 Test and develop Transport Strategy components 3 Work up funding bids 4 For use in large scale planning applications with developer charge | | | availability assessments and Strategic Transport Model. |
| Local Transport Plan 4 (LTP4) | Navtej Tung | <p>Not started. No Brief. No Project Plan but should be prepared in tandem with Local Plan. Awaiting updated DfT Guidance to be issued but delayed.</p> | Unknown, but largely internal | Spring/Summer 2025. | <p>LTP4 is vital to have when seeking DfT funding. Reliant on the Vision, Strategy, Strategic Transport Model and Local Plan Transport Assessment (plus other key documents) and preferred scenario selection. Can be developed in tandem with the Local Plan Transport Assessment. A 1 year programme is challenging to produce an LTP, it may only be in draft form and not an adopted document by Spring 2025. It will contain the Infrastructure and Implementation Plan of the Transport Strategy.</p> |
| Strategic Transport Policy – Draft Movement Chapter | No Local Plan lead | Inception was March 2022 and commenced in June 2022. | Unknown, but an allowance of £20,00 is recommended | n/a | Richard Latcham Associates. Check and update alignment between the policies contained within |

| Evidence Base Document Title | PRIORITY (Purple) Essential (Red) Necessary (Amber) Completed (Green) + Officer/Team Lead | Current Status | Current Funding Situation (Source: PID Working Draft/ Local Plan reserve) | Timeline to Completion | Commentary |
|---|---|--|---|---------------------------------------|---|
| This was a draft for the Transport Chapter for the Local Plan (largely for DM purposes) | | | | | the Draft Movement Chapter and the Thurrock Transport Strategy (3 Movement Chapters 6, 7 and 8) policies. Reflect emerging position with regards other sub-strategies, i.e. MRT, Freight and Active Travel. |
| Public Transport Strategy comprising the Rail Study, MRT and BSIP (as set out below) | Navtej Tung & Luis Herrera | Not started. No Brief. No Project Plan. | Unknown, but largely a compilation of 3 studies and internal | Spring/Summer 2025. | Three part study with BSIP completed. |
| Rail Improvement Opportunity/Feasibility Study | Navtej Tung & Luis Herrera | Not started. No Brief. No Project Plan. | Unknown, but an allowance of £30,00 is recommended | Spring 2025 | Will become part of the Local Plan Transport Assessment. |
| Mass Rapid Transit (MRT) Opportunity / Feasibility Study | Navtej Tung & Luis Herrera | No started. No Brief. No Project Plan. | Unknown, but an allowance of £30,00 is recommended | Spring/Summer 2025. | Richard Latcham Associates? Will become part of the Local Plan Transport Assessment. |
| Bus Services Improvement Plan (BSIP) | Navtej Tung | Completed Oct 2021. Brief agreed and work complete Updated completed July 2024 | | July 2024 | Consultants – Steer. Need to gauge political support for BSIP update. |
| Freight Strategy | TBC | Not Started. No Brief. No Project Plan. | £40,000 (Local Plan reserve FY unknown) | Spring 2025 (subject to procurement). | Internally / externally produced? To cover movement of freight, unauthorised HGV routing and safe access. |
| Local Cycling and Walking Infrastructure Plan (LCWIP) | Navtej Tung & Luis Herrera | Draft prepared by Transport Initiatives and Urban Movement. | Unknown, but largely a minor for update. Therefore, an allowance of £5,000. | Spring/Summer 2025. | Provides broad indication of proposed routes/improvements. Need to update with scenarios and preferred options. |
| Thurrock Parking Policy and Strategy Update | Matt Ford | Current version Feb 2022 (Mott McDonald). Update required. No Brief. | Unknown, but internal. | Spring 2025 | Mott MacDonald. Linked to DM policies and standards. Will inform major sites and density considerations. |

| Evidence Base Document Title | PRIORITY (Purple) Essential (Red) Necessary (Amber) Completed (Green) + Officer/Team Lead | Current Status | Current Funding Situation (Source: PID Working Draft/ Local Plan reserve) | Timeline to Completion | Commentary |
|---|---|---|---|---|---|
| | | No Project Plan. | | | |
| RETAIL, CENTRES & RURAL SETTLEMENT/AREA STUDIES | | | | | |
| Centres Study (this includes Retail and Commercial Leisure Needs Assessment) | Laura Bage | Not started. No Brief yet. Project Plan required. | £80,000 (Local Plan reserve FY 24/25). | Spring 2025. | Scope to be determined. Internal or external? Likely to be a Council priority |
| Thurrock Town and Local Centre Health Check Assessment | Louise Byfield | 2018 published. Update currently being undertaken. No Brief or Project Plan. | Unknown, but internal | August 2024 | Latest version is minimal. Update assesses Grays and the local centres. Does not assess Lakeside or neighbourhood parades. Local Plan team producing. |
| SPORTS, PLAYING PITCHES, LEISURE & OPEN SPACE | | | | | |
| Open Space Assessment Study | Irina Davis | Brief prepared, reviewed and finalised. No Project Plan. | £45,000 (Local Plan reserve FY 24/25). | Dec 2024 (5 months to complete, subject to procurement). | 2016 version (KKP) is out-of-date and requires significant update. Work to be undertaken by LUC. |
| Playing Pitch Need Assessment and Indoor and Outdoor Leisure and Sports Facilities Needs Assessment | Richard Hatter – looking for LP team to lead | Previously part of Active Place Strategy (Jan 2021). Not commenced. Draft Brief prepared and reviewed, awaiting amendments. No Project Plan. | £30,000 and £25,000 respectively (Local Plan reserve FY 24/25). | Spring 2025 (12 month programme, subject to procurement). | Scope and programme to be confirmed by Sport England. |
| FLOODING & WATER | | | | | |
| Strategic Flood Risk Assessment (SFRA) Stage 1 | Richard Hatter | Completed (Jan 2024). | n/a | n/a | AECOM Gaps to be covered in SFRA Stage 2. |
| Strategic Flood Risk Assessment (SFRA) Stage 2 | Richard Hatter | AECOM scope has been reviewed, Brief agreed and now commissioned. | £60,000 (Local Plan reserve FY 24/25). | Relies on baseline data not yet available. | Feedback to AECOM regarding scope required. |

| Evidence Base Document Title | PRIORITY (Purple) Essential (Red) Necessary (Amber) Completed (Green) + Officer/Team Lead | Current Status | Current Funding Situation (Source: PID Working Draft/ Local Plan reserve) | Timeline to Completion | Commentary |
|---|---|--|---|--|--|
| | | Project Plan required for agreement | Although £30 – 36k referred to in AECOM Scope document. | 12 weeks for Draft + 4 weeks review period + 4 weeks for final submission. Total of 20 weeks. | Many interrelated issues, closely linked to WCS. |
| Water Cycle Study (WCS) – Scoping Report & Detailed Study Scope | Richard Hatter | Completed (March 2024). | n/a | n/a | AECOM. |
| Water Cycle Study (WCS) – Detailed Study | Richard Hatter | Not started. Draft Brief – comments being discussed with AECOM. No Project Plan. | Unknown, but need to add scope of Mardyke Joint study with Brentwood BC, so an allowance of £20,000 is recommended. | 20 weeks but suggest more time needed, due to some missing and emerging evidence and consultations required. | AECOM Scenarios and housing and employment numbers/locations and transport modelling needed in advance of commencing work. Many detailed technical gaps exist. |
| Stanford Le Hope Surface Water & Flood Alleviation Studies | Richard Hatter | AECOM scope for Surface Water modelling has been reviewed and Brief agreed and work has commenced. | £17,000 for the SW modelling + report. Potential for scope to increase. | 12 weeks from commission. | AECOM? To be inputted into SFRA Stage 2. |
| GREEN BELT, NATURAL ENVIRONMENT, LANDSCAPE, BIODIVERSITY & GREEN SPACE | | | | | |
| Landscape Character Assessment – Stage 1 | Alison Campbell | Completed (2022). | n/a | n/a | Stage 2 not yet undertaken. |
| Landscape Character Assessment – Stage 2 | Amy Linford | Not commenced. No Brief. No Project Plan. | Unknown, but an allowance of £30,000 is recommended | August 2025 | Possibly undertaken by LUC? Will require growth scenarios/spatial options and Preferred Option for growth |

| Evidence Base Document Title | PRIORITY (Purple) Essential (Red) Necessary (Amber) Completed (Green) + Officer/Team Lead | Current Status | Current Funding Situation (Source: PID Working Draft/ Local Plan reserve) | Timeline to Completion | Commentary |
|--|---|---|---|--|---|
| BNG Guidance | Amy Linford | In preparation. | Unknown and largely internal, but an allowance of £20,000 is recommended | December 2024 | Being completed by ECC. |
| Green and Blue Infrastructure Strategy (GBI) | Amy Linford | Completed (2018) and updated (2023). | Possibly necessary, so an allowance of £25,000 is recommended | Unknown. | LUC. Suitable Alternative Natural Green Space (SANG) and many other key additions and requirements, required by Natural England and that update will be required. Possibility of update required after LNRS is completed. |
| Local Nature Recovery Strategy (LNRS) | Richard Hatter (temporarily) and then Place and Design Team | In preparation, almost complete. | Almost complete and undertaken by ECC | Subject to pre-public consultation in June and public consultation in summer 2024. | ECC. |
| Strategic Green Belt Assessment Stages 1a & 1b | Local Plan Team | Completed (Jan 2019). | | n/a | Completed by PBA (now Stantec) |
| Detailed Green Belt Assessment | Stantec/Sharon Jefferies | Not commenced but commissioned. No Project Plan. | £57,000 (Local Plan reserve FY 24/25). | Summer 2025 (6 months estimated completion, subject to start). | Arup commissioned but paused, as need for rescope, including confirming list of sites. Potential further work (extra fee) for village task. |
| CLIMATE CHANGE & ENERGY | | | | | |
| Climate Change Strategy Update | Irina Davis | Completed (Feb 2023). Update has no Brief or Project Plan. | Unknown but an allowance of £30,000 is recommended. | Unknown. | Needs updating (targets and methodologies). Also to consider updated policy documentation, LTC and Freeport. |

| Evidence Base Document Title | PRIORITY (Purple) Essential (Red) Necessary (Amber) Completed (Green) + Officer/Team Lead | Current Status | Current Funding Situation (Source: PID Working Draft/ Local Plan reserve) | Timeline to Completion | Commentary |
|--|---|---|---|------------------------|--|
| Local Area Energy Plan (LAEP) | Irina Davis | Not started. No Brief. No Project Plan. | Unknown and possibly not necessary, but an allowance of £10,000 is recommended. | Unknown. | Requires scenarios to commence and other key Local Plan evidence documents. Not clear if this work is required? |
| Energy Strategy Update | Irina Davis | Completed (June 2022). Update has no Brief or Project Plan. | £30,000 (Local Plan reserve FY unknown). | 3 months to complete. | Arup. Needs updating (targets and methodologies). Also to consider updated policy documentation, LTC and Freeport. |
| BUILT ENVIRONMENT & DESIGN | | | | | |
| Design Charter | Amy Linford | Completed as part of IPD. | n/a | Unknown. | May require update. |
| Design Codes / Guide | Amy Linford | Not started. No Brief. Project Plan available internally. | £100,000 (Local Plan reserve FY unknown). | End 2025 | Place & Design Team to lead. Will follow on from Design Charter. |
| Cultural Strategy - development of Cultural Infrastructure Mapping and Potential Projects List | Amy Linford | Not yet started | Unknown, but an allowance of £50,000 is recommended | End 2024 | Place and Design Team Action 1 from the Cultural Co-Location Strategy and Guidance Report |
| x6 Rural Settlement Assessments | Amy Linford | Completed (Dec 2023). | n/a | n/a | Informs other Local Plan evidence. |
| Assessment of Settings – Thurrock SAMs | Local Plan Team | Completed (April 2023). | n/a | n/a | ECC Places Services. |
| Comprehensive Historic Assessment | TBC | Not commenced. No Brief. No Project Plan. | £60,000 (Local Plan reserve FY 24/25). | Unknown. | ECC Places Services undertook a Report on Thurrock SAMs in 2019. ECC Places Services to undertake? Rural Settlement Assessments and Assessment of Settings – Thurrock SAMs need to feed into this document. |
| INFRASTRUCTURE, DELIVERY & VIABILITY | | | | | |

| Evidence Base Document Title | PRIORITY (Purple) Essential (Red) Necessary (Amber) Completed (Green) + Officer/Team Lead | Current Status | Current Funding Situation (Source: PID Working Draft/ Local Plan reserve) | Timeline to Completion | Commentary |
|--|---|--|---|---|--|
| Infrastructure Delivery Plan (Baseline) Update | No Local Plan lead | Draft received, but now requires updating, which is included within the current IDP commission. | n/a | End 2024 | |
| Infrastructure Delivery Plan (IDP) | No Local Plan lead | Fee proposal agreed, work started. <u>Stage 1</u> : High level infra needs based on early growth scenarios. <u>Stage 2</u> : Full IDP once detailed Local Plan growth scenarios established. | £104,675 (for Stages 1 & 2) (Local Plan reserve FY 24/25). As Stage 1 is paused and changed, some additional costs expected – an allowance of £15,000 is recommended | Dec 2024 for Stage 1 Autumn 2025 for Stage 2 (subject to HLAA, transport modelling/assessments and changed scenarios). | Work started on Stage 1 with 3 of 14 stakeholder engagement sessions using Local Plan team scenarios, but work paused until Sept 2024. Additional medium scenario added for consideration in Stage 1. Inter-relationship with Local Plan Viability Study Update. |
| Local Plan Viability Study Update | No Local Plan lead | March 2023 current version. Not started. No Brief yet. Project Plan required. | £10,000 (Local Plan reserve FY 24/25). | Summer/Autumn 2025 | HDH should undertake the work, but need prior notice and to agree a timetable and cost. There is an inter-relationship with IDP (Stage 2), as infrastructure costs required. Also, CIL, if pursued. |
| MINERAL & WASTE | | | | | |
| Mineral Safeguarding Area Study | Richard Hatter | Completed – needs updating. Not commenced. No Brief. No Project Plan. | £25,000 (Local Plan reserve FY 24/25). | Dec 2024 (3 months, subject to procurement). | This constraints study is needed to input into the Local Plan. |
| Minerals and Waste Local Plan | n/a | Not commenced. No Brief. No Project Plan. | No budget. | n/a | To be undertaken as a separate Local Plan. |

Evidence Base – Other Generic Recommendations

- 3.14.8 From reviewing all technical evidence base for the Local Plan, there are four further generic recommendations, as follows:
- Each evidence base document needs to have a clear Local Plan officer ‘owner’ – even if it is being produced by another team in the Council. The Local Plan officer ‘owner’ should manage (or input into) all Briefs, Project Plans, Methodologies and Draft Reports
 - Local Plan Manager (or equivalent) needs to manage ALL Local Plan evidence studies, have regular catchups with evidence base ‘owners’, check key documents, such as Briefs, Project Plans, Methodologies and Draft Reports.
 - Build in time to produce a Brief and Project Plan for ALL new studies/strategies – for those being undertaken internally and by consultants. Agree Briefs and Project Plan with Local Plan Manager before work commences.
 - The evidence base studies should be developed in two phases: Phase 1 – to inform the scenarios for growth and/or Preferred Option; and, Phase 2 – evidence that is developed based on the scenarios for growth and/or Preferred Option. This is explained graphically in **Figure 5.1** below, which sets out the need for two additional Technical Papers. These would clearly set out how the Council derived the growth scenarios and spatial options used in the IPD; and, how it will derive the growth scenarios and spatial options for the Regulation 19 Local Plan and what evidence data was used. The diagram shows this by setting out sequentially the process from the IPD to preparing growth scenarios/spatial options that are robust and that can be assessed and then developed into a Preferred Option for growth to be used in the Regulation 19 Local Plan. The two Technical Papers required are:
 - **Technical Paper 1** – retrospectively to demonstrate how the 4 growth scenarios and 5 spatial options and, indeed, the settlement proposals were derived and what evidence (if any) or reasoning was used; and,
 - **Technical Paper 2** – going forward, to determine the critical evidence studies (together with the vital and up-to-date input data needed) to create robust and defensible growth scenarios and spatial options. This will set out how the growth scenarios and spatial options were derived from evidence; and then, how the Preferred Options was derived from both evidence and the ongoing IIA assessment work.
 - Build in time in the overall Local Plan programme for consultants to submit fee proposals and be instructed, so that there is time for purchase orders and Works Orders to be put in place. Thurrock Accounts and Legal departments need to sign-up to undertaking these tasks within a set number of days, so that it can be worked into the overall Local Plan programme.

4 Task C: Review of PAS Report, Latest NPPF (Including recent policy changes) and for Adopted Local Plans identification of 3 Best Practice Examples

4.1 Introduction

4.1.1 **Task C** – this was to develop reviews of key policy documents and to identify three best practice examples of recently adopted Local Plans to use in the other work of this commission and to use in preparing the other Tasks for this commission and for the Local Plan team to use as reference material during the further development and production of the Local Plan.

4.1.2 This review is set out in more detail within the contract and as subsequently developed and agreed with the Council and is set out below in more detail.

‘Review of PAS Report, latest NPPF and other Key Policy Changes and Identification of 3 Best Practice Examples of Recently Adopted Local Plans

a. *Sub Task 1 – Review PAS Report;*

b. *Sub Task 2 – Review latest NPPF and other key Government policy changes and guidance; and,*

c. *Sub Task 3 – Identification of 3 Best Practice Examples of Recently Adopted Local Plans.*

4.1.3 *Early review of the recently produced PAS Report (31pp) to identify key information, findings and recommendations relating to the emerging Local Plan and the current Local Plan team and its resources. This task will be undertaken early, although in parallel with some tasks, as it may inform other tasks.*

4.1.4 *Within this task, it will be necessary to understand changes to policy and legislation during 2024, particularly further changes to the NPPF (2023); potential first suite of national development management policies; changes to Local Plan making to enable completion in 30 months (regulations, policy and guidance are expected by autumn 2024); and, any proposed infrastructure levy regulations.*

4.1.5 *The work on identifying best practice examples will initially identify three recently adopted Local Plans (identified as best practice), especially of Unitary Authorities, to identify the evidence base used and its timeframe to identify gaps, using such best practice. It will also identify reasons and examples of failed and delayed Local Plans for balance. This work will use the evidence base within the Council’s website; however, gaps need to consider the full life cycle of the Local Plan to adoption. In addition, these three examples can be used to guide the new Local Plan in terms of structure, content and style and recommendations will be set out.*

4.1.6 *Deliverable C: a report setting out the key findings for review by Council officers to ensure all relevant matters are captured, with recommendations for future actions to form part of the work through to Adoption.’*

4.1.7 The above sub Tasks were set out in the contact with the Council, but during the progress of the work these have been adapted to reflect the needs of the Council, the Local Plan and Strategic Services staff, senior officers and to adapt to the changing needs of the project.

4.2 Review of Planning Advisory Service (PAS) Report

- 4.2.1 The Planning Advisory Service (PAS) undertook a Planning Peer Review of Thurrock Council between 30 October to 2 November 2023. Feedback from this review was provided by PAS in a Report dated 13 December 2023.
- 4.2.2 The PAS Report sets out 11 recommendations, but not all recommendations are relevant to the Local Plan process. Most of the recommendations relate to Development Management and with wider planning function of the Council, including the recruitment of a Chief Planning Officer (now actioned) and a training programme for elected members. The key recommendations that relate to the Local Plan are R3 and R4, as set out below.
- 4.2.3 **R3 – Urgently progress the Local Plan by continuing to ensure sufficient resources are allocated to taking it through to adoption.** This should include:
 - a. Stronger internal processes – to secure cross-party ownership in order to deliver the huge opportunity for growth in Thurrock (including a plan development cross party working group led by senior members).
 - b. Political leadership and guidance – to ensure the Local Plan addresses the growth ambitions and creates the political environment necessary to ensure the Local Plan is agreed and delivered by the Council.
 - c. Managerial leadership and stronger project management – with a clearer focus on the steps needed to produce the plan in line with the current timetable, re-assuring all partners of a realistic programme and proportionate evidence base. Further PAS support is offered on this.
- 4.2.4 **R4 – Ensure the new Local Plan is promoted corporately and politically as the primary tool to drive housing, jobs and regeneration delivery in Thurrock.** Political leaders from all parties should ensure that all members understand that the Local Plan is the delivery tool for future growth in Thurrock.
- 4.2.5 Whilst recommendations R3 and R4 are the two key recommendations in relation to the Local Plan, there are other recommendations that will have an impact on the Local Plan that relate to the wider Council. These recommendations will also need to be addressed as they will set the context for the Local Plan. These recommendations are R1 and R2.
- 4.2.6 **R1 – Urgently develop a new Vision for Thurrock and a new Corporate Plan with clear strategic priorities to address the silo working by all departments and achieve the stated aim of One Council: One Voice.** The development of a Vision and Corporate Plan need to be actively supported by the planning service and should form the basis of an engagement programme to embed this into future departmental business planning.
- 4.2.7 **R2 – Urgently develop and agree a stronger corporate narrative,** with the planning service helping to shape a strong communications strategy around:
 - a. The necessity and benefits of growth;
 - b. The role of planning and pivotal role of the Local Plan in shaping this; and
 - c. Securing balanced communities for the longer-term future of all citizens.
- 4.2.8 **Appendix C** sets out in Table 2.1, following accounting for the recommendations in both the PAS Report and the Planning Service Transformation and Improvement Plan, the recommendations and actions that must be addressed in the production of the new Local Plan. It is essential that a timetable is set out and adhered to, this will instil confidence in the

process. The Local Plan will require a first-class Project Manager. In terms of communication, this is essential and needs to involve elected Members, senior officers, officers of the Council, statutory consultees, the public and any other interested party. This will need strong leadership and ‘champion’ Members and senior management.

4.3 Review Latest NPPF and other Key Government Policy Changes and Guidance)

4.3.1 The National Planning Policy Framework (NPPF review identifies key elements of the December 2023 NPPF that the Thurrock Local Plan will be, as a matter of policy, be required to comply with. A rating to each NPPF policy paragraph is applied as set out below.

- a. **Red**: ‘critical’ matters, within the NPPF to be complied with that impact the Soundness of the Local Plan;
- b. **Amber**: ‘important’ matters, within the NPPF to be complied with that impact the Soundness of the Local Plan; and
- c. **Green**: ‘less important’ matters, within the NPPF that set a context or do not require compliance and that do not impact the Soundness of the Local Plan.

4.3.2 The NPPF review identified national policy requirements within the NPPF for the purposes of Local Plan making. This Section identifies 45 ‘critical’ and 50 ‘important’ national policy provisions to consider for the preparation of the Local Plan, alongside others that may relate or represent supportive text. The review and associated commentary are provided within Table 3.5 of the Technical Note Appendix C and a summary of critical and important matters is provided below.

4.3.3 ‘Critical’ and ‘Important’ matters, for Local Plan making, identified relate to the following NPPF Chapters:

- a. Achieving sustainable development;
- b. Plan-making;
- c. Delivering a sufficient supply of homes;
- d. Promoting sustainable transport;
- e. Making effective use of land;
- f. Achieving well-designed and beautiful places;
- g. Meeting the challenge of climate change, flooding and coastal change; and
- h. Conserving and enhancing the natural environment.

4.3.4 These matters are dealt with in more detail within **Appendix C** in Tables 3.1 – 3.3. Table 3.4 sets out in considerable detail, with commentary, the detailed requirements of the latest NPPF. Clearly, the Local Plan team should review Appendix C and the NPPF when updating the evidence base or undertaking work on strategic sites, scenarios or the preferred option, to ensure policy compliance is robust.

Other Key Government Policy Changes and Guidance

4.3.5 The other key policy changes expected during 2024 are set out by the previous Government – [The key policy and legislation changes to expect in 2024 | Planning Resource](#) (this is a

Planning magazine assessment of seven policy and legislation changes expected in 2024, set out in an article dated 26 January 2024. As yet there have been no specific announcements relating to changes that affect Local Plan making.

4.3.6 The eight policy/legislation changes expected are set out below with commentary:

- **Further Review of NPPF** – this was an intention to launch a further review following the latest NPPF publication in December 2023. It was intended that this would be a ‘bigger and more complex’ revision, especially incorporating the planning system envisaged under the LURA, such as the new NDMPs, more weight given to social rented housing, changed definition of affordable housing, more support for community-led housing, promoting small-scale interventions for nature, climate change and flood risk and promoting greater safety for women and girls. Also, greater priority for EV charge points and the Freeports Delivery Roadmap (<https://www.planningresource.co.uk/article/1856686/government-amend-nppf-support-freeports-roll-out>) and possibly reforms around logistics infrastructure involving the DfT’s work on the ‘Future of Freight Plan’ (<https://www.planningresource.co.uk/article/1829413/government-launches-consultation-role-planning-freight-logistics-sector>).

Changes to the NPPF and other radical planning policy changes are often cited as the main causes for pausing/delaying Local Plan production. The new Government following the General Election have strongly indicated that they would update the NPPF in its first 100 days in Government, with consultation on those changes before the summer recess, with a new consultation in July 2024. This may involve mandatory housing targets, an effective mechanism for cross-boundary strategic planning, reforms to the Green Belt to make it easier to develop old and poor quality sites (‘grey belt’ land), a strengthening of the presumption in favour of sustainable development and tough action to ensure more local authorities have up-to-date Local Plans. Also, potential sites for new towns may be introduced in year one of a new Labour Government.

- **Written Ministerial Statements (WMS) and updates to PPGs** – these may be used to effect changes to national planning policy without the time-consuming need for consultation. These methods would allow fast policy changes to be made early into the new Government, such as the importance of housing and affordable housing delivery, reinforcing the presumption in favour of sustainable development, which may involve over-riding local decision making for housing applications. It is understood that a Labour Government may well use NDMPs as part of its revisions to planning policy.
- **First Suite of Development Management Policies (NDMPs)** – the Government consultation in December 2022 set out the broad trajectory for NDMPs, as a separate suite of policies to sit alongside the NPPF, given legal force by the LURA. It is currently unclear when these policies will be published. These were originally proposed in the ‘Planning for the Future’ White Paper in August 2020, full consultation was expected in 2024, but the future of these policies is unknown until after the General Election.
- **Changes to NSIP Regime** – these were issued in mid-May 2024 as a series of six updated Guidance Notes from Government ([1042: DCO examination changes come into effect accompanied by guidance - BDB Pitmans](#)), with two new ones. These were: Pre-Application, Fast Track Applications (new), DCO Drafting (new), Acceptance, Pre-Examination and Examination.
- **Changes to Local Plan-Making to enable completion in 30 months** – there was a Government consultation on these reforms from July – October 2023 ([Levelling-up and Regeneration Bill: consultation on implementation of plan-making reforms - GOV.UK](#) (www.gov.uk)). As yet no results from this consultation have been published, although Government indicated that Regulations, Policy and Guidance would be issued in Autumn 2024.

- **Extensions to Permitted Development (PD) Rights** – in February 2024 DLUHC confirmed it would push ahead with significant extensions to PD rights, including extending to premises larger than 1,500 square metres an existing right to convert Class E (commercial properties into homes). Other changes expected include making bigger extensions without planning consent, restrictions on upward extension, demolition and rebuild reduced or removed, ending restriction on installing heat pumps and EV charge points and changes around planning rules for short-term lets and a new use class.
- **Brownfield and Other Changes in Response to London Housing Review** – this relates to the London Plan review, which was published in February 2024, that may involve further changes to the London Plan, such as a presumption in favour of brownfield land development, which may involve other Councils if implemented as part of a further revised NPPF.
- **Other Changes during 2024** – these include consultations on replacing the developer contribution system with a new infrastructure levy and regulations (although the Labour Party has previously stated it does not intend to introduce this change); Regulations governing residents votes on development in their streets; consultation on extension of time agreements and a review of the statutory consultee system; consultation on proposals to encourage quicker developer build-out of applications; report from Task Force about the merits of adopting a ‘spatial planning’ approach for NSIPs; guidance on taking account of past over-delivery in decision making; and, the introduction (possibly in 2025) of Environmental Outcomes Reports (EOR) to replace the environmental permits system.

4.4 Adopted Local Plans – Review of Three Best Practice Examples

- 4.4.1 This Section was prepared to review three recently (within the last three years) adopted Local Plans. It identifies best practice examples and list what other Local Planning authorities used as their Local Plan evidence base, and it captures the following important elements:
- a. Why Local Plans fail or get delayed / paused;
 - b. What is the list of evidence base documents that were used, so as to determine any gaps in the current Thurrock list of evidence base documents;
 - c. The structure and format of each to determine if the Council can use that later once the Council get to Reg 19, as a way of structuring / presenting the Thurrock Local Plan;
 - d. Determine if the latest Reg 18 structure for the Thurrock Local Plan is suitable going forward, notwithstanding it was not a full plan and did not contain a standard structure (this determination is contained within Appendix C, Section 4.35 – 4.37); and,
 - e. Determine if there are any latest policy compliances that need to be covered and how.

Why Local Plans fail or get delayed / paused

- 4.4.2 The key reasons for recent Local Plan failure either during preparation or at Examination include lack of compliance with the duty to cooperate, not meeting the housing needs and tests of soundness (evidence base and technical justification). The first test that inspectors have to consider when reviewing the draft Local Plan documents is whether or not the Local Planning authority (LPA) has complied with the duty to cooperate, which is a legal test. If it is determined that the LPA has failed in its duty to cooperate, then there is no other option but for the Local Plan to be withdrawn to rectify the failure to fulfil the duty to cooperate requirement. Once the Inspector has concluded that the LPA has complied with the duty to cooperate, they will then go on to assess the remainder of the Local Plan. They will assess if the Local Plan meets the housing need for the authority. If they have failed to set out policies in their Local

Plans to meet their assessed local housing need and have failed to identify suitable sites to deliver housing, the Local Plan will fail.

- 4.4.3 Examples of Local Plans that have recently failed are:
- a. Sevenoaks – Unsound and duty to cooperate – formally withdrawn on 16 November 2022.
 - b. Tandridge – Unsound and impact of housing growth – formally withdrawn on 18 April 2024.
 - c. Tonbridge & Malling – Duty to cooperate – formally withdrawn on 13 July 2021.
- 4.4.4 It is clear from the detail set out in Technical Note **Appendix C** the importance of progressing the Local Plan for Thurrock in a timely manner, but especially ensuring that the submission is sound, complies with the duty to cooperate and has a robust evidence base. For instance, there were 15 Local Authorities in 2018 who were written to by Government and required to progress their Local Plan and this has continued over recent years.
- 4.4.5 Government announced on 24 May 2024 ([Planning Inspectorate's approach to casework during the pre-election period 2024 - GOV.UK \(www.gov.uk\)](#)), following the announcement of the General Election on 4 July 2024, that the Planning Inspectorate (PINS) will not issue any findings of soundness or legal compliance of Local Plans until after the General Election and also postpone any politically-sensitive decisions and recommendations. PINS also added that all scheduled Local Plan Examinations and Hearing sessions will continue during the pre-election period and new Examinations will also begin. DCO recommendations will also continue to be submitted, as normal. The Government announced that three major DCO decisions, including the Lower Thames Crossing (LTC) in Thurrock, would be delayed until 4 October 2024.
- 4.4.6 It should be noted that a report in Planning magazine on 20 May 2024 has confirmed that **Stoke-on-Trent City Council** may be set to adopt an updated Local Plan timetable with a revised date for Examination submission, four years later than that previously proposed and one year after the Government's deadline for submitting development strategies under the current system.
- 4.4.7 Stoke-on-Trent City Council had previously proposed to submit its draft Local Plan for Examination in summer 2022, [according to its current timetable](#). Also, the Council confirmed that an Issues and Options consultation was undertaken in summer 2021. It goes on to state that work has progressed in terms of ensuring an up-to-date evidence base, including key studies to assist with determining housing and economic needs and supply and infrastructure requirements; and, that a Regulation 18 draft consultation document is being prepared that will involve consultation on a full suite of development management policies and site allocations.
- 4.4.8 The City Council stresses that *'through various consultations the government has placed increased importance on Council's ensuring they have an up-to-date local plan in place. This has led to uncertainty; however, the council has continued to progress its Local Plan.'* Therefore, the new timetable proposes to hold a Reg 18 preferred options consultation in September/October 2025, followed by a Regulation 19 pre-submission consultation in April/May 2026. Submission for examination would then follow in November 2026. It should be noted that the Cabinet Report states in its key risks that the Council could be subject to a legal challenge if a Local Plan Timetable is not published and can expect intervention from the Secretary of State for Levelling Up, Housing and Communities (DLUHC). Consequently, Cabinet decided that the Secretary of State for DLUHC should be notified of the revised Local Plan timetable.
- 4.4.9 The City Council's Cabinet decided unanimously to adopt the new timetable at the Cabinet meeting on 21 May 2024, noting that it was vital to get the Local Plan right and take time to do so whilst keeping residents informed of progress.

- 4.4.10 It should be noted that Government has [made 30 June 2025 the deadline for submitting local plans](#), after which local authorities have to prepare plans under the proposed new plan-making system. It is therefore possible that other Councils may well adopt this more precautionary approach as this deadline gets closer. It was noted in the Cabinet meeting that the guidance and secondary legislation necessary to develop and implement these transitional arrangements were unlikely to come forward before the General Election, which is now to take place on 4 July 2024.
- 4.4.11 It is possible following the General Election on 4 July 2024 and the previous proposals for Local Plan transitional arrangements that the Local Plan system may change, if so, it could have a major impact on the Local Plan Programme that is proposed in **Task I** below (**Section 9**). In fact, as reported on 5 June 2024, **Bromsgrove District Council, Worcestershire has announced it is delaying its programme consultation on its Local Plan specifically due to the General Election**, following which a new timetable will be announced. It is unclear what stage the Local Plan is at or when the consultation was originally due. Bromsgrove DC is a Green Belt local authority with modest proposed growth.
- 4.4.12 Furthermore, seven other Councils announced on 10, 17 and 21 June respectively that they were also postponing consultations on their Local Plans due to the General Election and likely future changes to the planning system and scarce resources – **Isle of Wight Council** (just delayed by 6-weeks until 8 July 2024 and was pause in 2023 for 4-months due to Government policy changes); **York City Council** (also just delayed by 6-weeks until 8 July 2024 on its gypsy and traveller policies); **Horsham District Council** (again, just delayed by 6-weeks until 8 July 2024); **Stockport Metropolitan Borough Council** (a Green Belt authority) has paused its Regulation 18 consultation until later in the summer, largely due to planning policy changes and the General; **Uttlesford District Council** has delayed publication of its Regulation 19 consultation by two weeks until after the General Election (this is following it being placed in planning ‘special measures’ for its decision making quality in February 2022); **Leicester City Council** postponed its EiP until October, partly due to venue issues but also to allow any further policy changes to come forward; and, **West Northamptonshire Council** has cancelled its Planning Committee that was to review the results of its Regulation 18 consultation due to the General Election.
- 4.4.13 Thurrock Council needs to seriously consider these two recent local authority approaches/decisions to its Local Plan timetable and is likely to need to formally amend its Local Development Scheme (LDS) in Q4 2024 and once approved, notify the Secretary of State for DLUHC of that amended timetable. More detailed recommendations are set out below in **Section 9**.

Local Plans Adopted Since January 2020

- 4.4.14 According to statistics published by the Government, Table 4.1 lists the local Councils that have had Local Plans (that contain strategic plans) adopted since 1 January 2020. For the full publication of Plans containing strategic policies being adopted up to 22 January 2024, use the following link: [Plans containing strategic policies - GOV.UK \(www.gov.uk\)](#).
- 4.4.15 Not all local Council’s listed in Table 4.1 are comparable to Thurrock, due to the geographical area they cover or not all of the of the plans listed in Table 4.1 resulted in a new Local Plan. Some were just updates to existing policy. Therefore, a number were removed from the list. The review of Local Plans has only gone back to the start of 2022 and not the full three years, as in order to find best practice examples, it is appropriate to focus on newer Local Plans, as they will have been based on more up to date planning policy. To find three best practice examples of recently adopted Local Plans, that are comparable to Thurrock, Local Plans have been selected if they have any of the following:
- A growth agenda;
 - A Green Belt;

- c. A Freeport; and,
 - d. More than one urban area.
- 4.4.16 Using this criteria, the following three have been selected as best practice examples of recently adopted Local Plans:
- a. **Halton Borough Council: Delivery and Allocations Local Plan** – this Local Plan was selected because it is for a unitary Council, a Green Belt policy and has a growth agenda.
 - b. **Eastleigh Borough Council: Full Local Plan** – this Local Plan was selected because the geographical area it covers includes three large urban areas and has a growth agenda.
 - c. **Wyre Forest District Council: Local Plan Review** – this Local Plan was selected because it has a growth agenda, a Green Belt policy and two Local Enterprise Partnerships (LEPs).
- 4.4.17 For each of the selected Local Plans, within Tables 4.2, 4.3 and 4.4 in **Appendix C**, set out the evidence base documents used for each Local Plan that were then used to produce Table 4.5, which sets out the list of evidence documents that are considered to be required for the Thurrock Local Plan, based on these three best practice examples.
- 4.4.18 In addition, and again for each of the selected Local Plans, a list of their structure/content for each Local Plan was prepared and from these conclusions are drawn about both the most appropriate structure for the Thurrock Local Plan and whether the Initial Proposals Document (IPD) for Regulation 18 structure/content was appropriate. These recommendations are set out in Section 4.35 and 4.37 of **Appendix C**. However, the structure/content requirements of Regulation 19 must be complied with as the statutory requirements.

5 Tasks D and E: Review of Council's Local Plan and Other Teams Resources, Skills and Management

5.1 Introduction

5.1.1 This section sets out the review of Thurrock Local Plan team, consultants used for Local Plan work, Local Plan management and members involvement. The scope of the review is set out below.

'Tasks D and E: Review of Council Local Plan and Other Teams Resources and Skills Gaps and Management

- *Sub Task 1 – Local Plan team and other Council officer interviews;*
- *Sub Task 2 – Local Plan management team and other Council management interviews;*
- *Sub Task 3 – Identification of current consultant support;*
- *Sub Task 4 – Member workshops and Local Plan involvement; and*
- *Sub Task 5 – Prepare Local Plan Organisational Structure covering Tasks E and F.*

This work will identify throughout the Council all staff that were involved in preparing the latest Initial Proposals Document and evidence base documents and all other officers within the Council that could be involved in particular topics (such as health, economic development, urban design, environment/ecology/landscape, PROW, transport, utilities, infrastructure delivery, etc.) or locations within the Local Plan. The following information will be required for each staff member: specialisms and professional interests and the available time to commit to Local Plan work in days/week and other project work. This will be undertaken through a series of officer interviews.

In addition, all current Council support from consultants needs to be identified, specifying topic, scope, length of support and current costs.

In addition, it will be necessary to determine gaps in both specialisms and time that could be filled with Stantec support and to develop an initial team and management structure going forward. Also, understanding the Council's proposals for Member involvement and any Local Plan Task Force or specific Local Plan Committee will be vital. Furthermore, understanding the current Local Plan team's proposals for developing the Regulation 19 document.

Deliverables E and F: two short reports on the following:

- *Current Council team organisational structure and gaps (skills) (including the Local Plan team and wider Council officers) and proposals for the future Local Plan team with Stantec. Although it should be noted that these proposals cannot be concluded until the finances are reviewed/endorsed and the evidence base/Local Plan consultations have been reviewed; and,*
- *Proposed management and team structure going forward through the relevant Director, Chief Planning Officer and Head of Strategic Services and the ongoing relationship with Development Management, additionally involving creation of the proposed organisational structure going forward. This would focus on optimum utilisation of current Council team*

members and their skills to promote their interest and future commitment and be supported by a suitable Stantec team.

This will also involve a series of Member workshops to determine their future Local Plan involvement, the need for any Task Force and for technical and progress briefings.'

- 5.1.2 This Section will be structured around the above Sub Tasks and the results of the sub-sections below (and related Appendices) have fed into the proposed Local Plan Structure Chart, as **Figure 5.3** within **Section 5.7** below and the Final Recommendations in **Section 9** below and been informed by the meeting notes in **Appendix D**.
- 5.1.3 The sub sections below are summaries of activities and sub tasks undertaken, as follows:
- **Section 5.2: Local Plan Team** – meetings held on 28 March and 23 April 2024 and key findings are summarised.
 - **Section 5.3 Strategic Services and Local Plan Management** – meeting held on 10 April 2024 and key findings are summarised.
 - **Section 5.4 Other Key Council Managers Review** – meetings held on 24 and 25 April and 1 May 2024 and key findings are summarised.
 - **Section 5.5 Current Consultant Support to Local Plan** – this is summarised in **Table 5.1**.
 - **Section 5.6 Member Involvement in the Local Plan** – the background and context is set out, together with the current situation and recommendations are made.
 - **Section 5.7 Local Plan Organisational Structure** – the existing structure and proposed structure is set out together with basic principles for change and recommended changes.
 - **Section 5.8 Local Plan Team Members Role and Responsibilities** – sets out the existing roles and responsibilities, principles for change and the recommended changes.

5.2 Local Plan Team Review

- 5.2.1 Prior to meeting the Local Plan team, the previous Strategic Services Manager and the previous Local Plan Manager provided Stantec with the following information for review:
- Local Plan team individual roles and responsibilities;
 - Previous structure charts for the Local Plan team;
 - The Local Plan Business Case and a series of related documents/Briefing Papers relating to resources and budgets;
 - A range of additional information, including the working Project Initiation Document (PID), Develop Forum information, Local Plan Programme, Corporate Risk document, Green Belt overturns, various Council planning documents and further information on Kanban and especially 'Placemaker'; and,
 - Weekly meetings were held with the Local Plan Manager from mid-March until early May 2024 where technical discussions were held, and information shared about the team and Local Plan process/progress.
- 5.2.2 Stantec met twice with the whole Local Plan team and other team managers and held 1-2-1 meetings with each individual Local Plan team member on 28 March 2024 and 23 April 2024.

Meeting notes for both collective and individual meetings are in **Appendix D.1** (for Tasks D and E) respectively and are in note format, are summarised in Section 5.2.4 below are a true reflection of those discussions.

5.2.3 The initial meeting on 28 March 2024, with the whole Local Plan team and other team managers and individually, was to introduce the Stantec commission and gain initial thoughts from the team, as a whole and individually, to what their thoughts were on items (and are in note format, are summarised in Section 5.2.4 below are a true reflection of those discussions), such as:

- Local Plan project management;
- Senior management involvement in the Local Plan;
- Roles and responsibilities for each Local Plan member;
- Involvement of members in the Local Plan;
- Feedback on individual evidence base studies;
- What contacts each Local Plan member has with other departments;
- Key issues for the Local Plan;
- What each Local Plan member has enjoyed working on and preferences for going forwards; and,
- Any Local Plan gaps.

5.2.4 The Local Plan whole team and 1-2-1 meeting notes sets out feedback from all Local Plan team members (see **Appendix D.1** (for Tasks D and E) for full meeting notes, which are in note format) from both meetings on 28 March and 23 April 2024. However, in summary the **top 15 key points or issues** raised by **Local Plan team members** are set out below:

- The Local Plan team have no junior staff and therefore team members are all undertaking junior technical/administrative tasks and there has been no full Local Plan team since before Covid. In addition, the Local Plan team do not have good contacts with other departments within the Council, such as Strategic Transport, Housing and Economy, etc.;
- Local Plan team and its activities have not been properly project managed and has had too many 'interim' managers and there were concerned about meeting the current LDS Local Plan programme;
- Lack of Local Plan team focus on IPD Consultation work and producing Consultation Report, whilst focussed on too many other tasks;
- Lot of 'unknowns' for the Local Plan, including Lower Thames Crossing (LTC) and impact on Local Plan evidence base/scenarios, Government new Local Plan regime, etc.;
- There are major sites in Thurrock currently being promoted for development, including LTC DCO, Norwich to Tilbury DCO, port development and major housing sites;
- Too much focus on 'Call for Sites' and using those 200+ sites to create scenarios, without the necessary evidence or capacity considerations;
- Regulation 18: the 4 growth scenarios and 5 spatial options are not based on robust evidence studies;

- Feedback provided a range of evidence base documents, which each Local Plan team member is working on are covered more fully in **Section 3** above. Clearly, there are many evidence base documents that have either not been started or not been completed yet;
- Housing viability (especially in urban areas, such as Grays, e.g. Titan Works and site next to Council offices) and lack of housing delivery across Thurrock is a key issue that needs both analysis and resolution, via Viability Update work (HDH Consultants);
- Previously, senior management communication has been poor over recent years and had a lack of understanding of Local Plan team issues. It is important for senior managements to engage with and 'own' the Local Plan. It would be helpful for the Chief Planning Officer to be present regularly at SLT and is there a need for Strategic Services Manager role longer term?;
- The Local Plan is not properly included in the Risk Register or with any mitigations, especially highlighting potential funding issues (even with the Local Plan Reserve);
- The PAS Report did not understand that Members may have stalled Local Plan progress in the past;
- Previously, Members have not had a good understanding of planning and of the Local Plan. Members need more training on the Local Plan / planning and engaged throughout the Local Plan process;
- Changes in Members at elections invariably creates issues in terms of approach and policy for the Local Plan process. However, proposals for a Local Plan Working Group may well resolve this issue, if implemented; and,
- Strategic Transport should be part of the Local Plan team broadly and not be in a different Directorate.

5.2.5 The uncertainty since the designation of the S114 Notice in December 2022, changes in Local Plan and Strategic Services managers, redundancies across the Council and lack of project management on the Local Plan, has resulted in Local Plan team members feeling deflated and unsupported. However, it appears that the team welcome the drive to project manage and deliver a sound Local Plan, with new management in place. There is a sense of commitment and positivity to deliver a Local Plan that works for Thurrock.

5.3 Strategic Services and Local Plan Management

- 5.3.1 The Local Plan management meeting with the previous Interim Strategic Services Manager), the previous Local Plan Manager and the Chief Planning Officer) was held on 10 April 2024 and the meeting note is contained in **Appendix D.1**, which is in note format.
- 5.3.2 Also, Stantec held weekly progress meetings with the Chief Planning Officer, the Programme Management Officer and the Performance and Support Manager, throughout the 3-month project, with the Interim Executive Director of Place also attending these meetings during the first 6-weeks of the project. The top 12 points or issues raised by **Thurrock Management** (see **Appendix D** (for Tasks D and E) for the full meeting note, which are in note format) were:
- Local Plan Strategic Objectives are the same for Initial Proposals Document (IPD) (December 2023) and Issues and Options 2 (December 2018) due to lack of time; and the IPD (reg 18) is not properly evidenced. The Strategic Objectives need to be revisited, as well as the Local Plan Vision, to ensure they align with Thurrock's new Corporate Plan, when finalised.

- Even with high quality officers and consultants in place, it is still essential for Members to be aligned with Local Plan policies, priorities and Vision.
- It is necessary to think about liaison with DLUHC, but carefully consider when and what to engage on. In particular, matters such as the Local Plan programme (the LDS) and changes to Government's proposed Local Plan regime, but also to allow briefings, at an appropriate time, about the Developers Forum, the Council's Corporate Plan and progress on the Local Plan.
- Management structure is important and there are current structural issues, which need to be reviewed. There needs to be clear roles and responsibilities with the Local Plan management team and more clarity on team members roles too, especially ensuring project management of the Local Plan production itself. When clearer roles and management is stable likely to become a robust team.
- There has been an issue with finding the right person to fill the vacant Local Plan Manager position, either as an interim or full-time.
- There is a need to prioritise Local Plan evidence base studies and to ensure briefs are technically reviewed and produced in a timely way and then project managed going forward.
- There is a need to ensure that all evidence base studies have robust Technical Briefs, a clear timeline and are properly project managed.
- The Local Plan team is currently under-resourced and good staff are leaving, so there is a need to retain existing staff.
- There will be a need for consultants on some specialist technical areas and possibly overall project management.
- There is limited Vision (and progress) on a range of topics, such as how to unlock sites, Grays town centre redevelopment, Lakeside Public Realm Improvement Plan, etc. and often without any Brief to guide the work.
- Considerable technical feedback was provided on individual Local Plan evidence base studies, which has been fed into **Section 3** above.
- Local Plan work programme needs to include two Technical Papers (on how the IPD 4 growth scenarios, 5 spatial options and individual settlement proposals were derived and how scenarios were derived and what key/vital input data is required from evidence studies in order to create robust scenarios, going forward – this was because growth scenarios and spatial options were included that were not based on sound evidence, which needs to be explained now) and Topic-based Papers on key topics as summaries of key evidence studies for use at Examination.

5.3.3 The role of evidence base studies and one of these Technical Papers going forward (and in particular in relation to the scenarios to be used in the further development of the Infrastructure Delivery Plan (IDP)) was set out in a flow diagram, agreed with the Chief Planning Officer. This flow diagram is reproduced below as **Figure 5.1**.

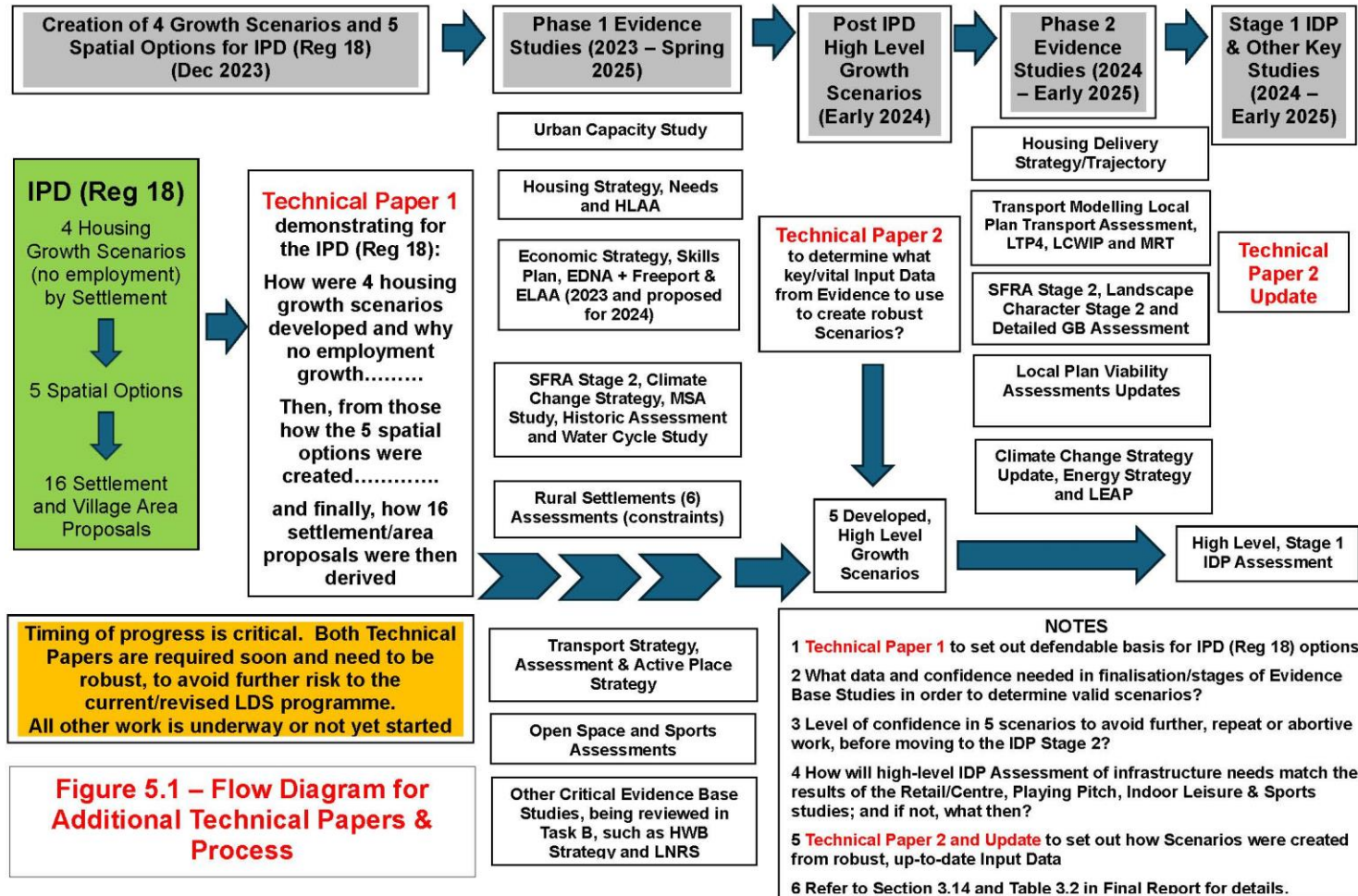


Figure 5.1: Flow Diagram for additional Technical Papers and Process

5.4 Other Key Council Managers Review

5.4.1 Stantec met with other closely related ‘Place’ departments in the Council and team members, as follows:

- Transport Development Manager, Place and Design Manager and the Strategic Services Manager on 24 April 2024. Meeting note is included in **Appendix D.1**. The leads for these departments also attended the whole Local Plan team meetings, as set out in **Section 5.2** above.
- Housing and Employment Manager and team on 25 April 2024 and 1 May 2024. Meeting notes are included in **Appendix D.1**.

5.4.2 The list in **Table 5.1** below are the Local Plan evidence studies that are being produced by other related teams (within the Place Directorate) in the Council or they are managing the consultants.

Table 5.1: Local Plan Evidence Base Documents Being Produced by Other Related Council Teams

| Council Department | Local Plan Evidence Base |
|--------------------------------|---|
| Strategic Planning Team | Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (GTAA) Buckles Lane Accommodation Assessment (GTAA) Gypsy and Traveller and Travelling Showpeople Site Assessment Study Indoor Leisure and Sport Facilities Needs Assessment Playing Pitch Need Assessment Strategic Flood Risk Assessment (SFRA) Stage 1 Strategic Flood Risk Assessment (SFRA) Stage 2 Water Cycle Study (WCS) Stanford Le Hope Surface Water & Flood Alleviation Studies Local Nature Recovery Strategy Minerals Safeguarding Area Study Minerals and Waste Local Plan (no budget or resource and will not be part of this Local Plan Programme) |
| Design and Place Services Team | Urban Capacity Study Landscape Character Assessment Stage 1 (potentially Stage 2) BNG Guidance Green and Blue Infrastructure Strategy (GBI) Design Charter Design Codes / Guide |

| Council Department | Local Plan Evidence Base |
|----------------------------|--|
| | X6 Rural Settlement Assessments |
| Development Transport Team | Thurrock Parking Policy and Strategy |
| Strategic Transport team | Local Transport Vision Update Strategic Transport Model (with Ridge and City Science) Thurrock Transport Strategy Local Transport Plan 4 (LTP4) PUBLIC TRANSPORT STRATEGY, involving three parts: <ul style="list-style-type: none"> • Rail Improvement Opportunity/Feasibility Study (not commenced) • Mass Rapid Transit (MRT) Opportunity / Feasibility Study • Bus Services Improvement Plan (BSIP) (being prepared by Steer) Freight Strategy (now completed) Local Cycling and Walking Infrastructure Plan (being prepared by Transport Initiatives and Urban Movement) |

5.4.3 The **key 25 points or issues** raised by **other related teams within the Place Directorate** about the Local Plan (see **Appendix D.1** (for Tasks D and E) for full meeting notes, which are in note format) are set out below.

- There needs to be a link between the Corporate Plan and Local Plan – they need to be joined up and the Local Plan needs to deliver corporate priorities, as set out in the Corporate Plan. It is understood that the Corporate Plan will be published in early July 2024 and then determined by full Council in July 2024.
- Feedback provided on other Council strategies, which has been fed into **Section 3** of this report.
- Other departments in the Council are working on a large number of evidence base studies for the Local Plan. Other departments are frustrated with how the Local Plan team work, often without Brief or timelines and how work is not project managed.
- Gaps in Local Plan (and other Council departments) skills, e.g. sustainability, viability and transport.
- Vision – senior management and members are not setting the vision for Grays and Thurrock. There is a need for a strong vision to drive the strategic objectives and sites in the Local Plan.
- There has been limited corporate leadership and support for the Local Plan. Previously, senior managers had limited planning experience, which led to problems in staffing and resourcing in planning.
- Employment land values are higher than housing land values in Thurrock, particularly in urban areas such as Grays, which leads to a problem in delivering housing sites, as they are unlikely to be viable in urban areas.

- Local Plan Regulation 18 was not robustly evidence based.
- Local Plan (IPD – Regulation 18 production) has had limited project management.
- Found Strategic Services Manager’s post valuable, as it provided a link with Senior Management and Members.
- There has been limited input into the Corporate Risk Register for the Local Plan and previously false reporting.
- ‘Duty to Cooperate’ is not currently undertaken properly in Thurrock or adequately evidenced.
- Lack of monitoring or being set up for the future for the Local Plan.
- The Local Plan priorities are not being set for the Local Plan team.
- Homelessness (increased by 22%) and housing affordability is a key issue in Thurrock and there is a need for further engagement/involvement with RSLs soon to create more ‘social housing’. In addition, there is a shortage of rented accommodation and a strong need for new stock.
- Housing viability (in urban areas) and lack of housing delivery across Thurrock is a key issue. House prices are very low, considering access into London, but with London construction costs. The Council’s housing department has experience delivering housing sites and an understanding of viability of sites.
- Serious lack of affordable homes in Thurrock and no housing delivery, including affordable housing. Very few Housing Associations have housing stock in Thurrock. There are also currently no RSLs working in the Borough and delivering affordable homes in Thurrock.
- There is much work ongoing regarding skills development but much more to do and funding is only secured until March 2025.
- The LEP has been dissolved after April 2024 and there responsibilities and functions passed onto the Upper Tier Authorities, such as Thurrock Council. However, there is no indication of any additional funding and previous Government wanted LAs to undertake joint working, potentially through the Business Board for Greater Essex.
- Town Funds are very positive for public realm and property regeneration and there is £40m over 2 years to deliver a range of projects: Grays town centre, Purfleet, Stanford-le-Hope station, Grays underpass, Grays Riverside regeneration, etc.
- Need strong leadership at the top management level in order to deliver development and Local Plan properly and in a timely fashion.
- Grays High Street is viewed as not safe, and people do not want to visit. Housing sites in Grays urban area are not viable. There is a need for strong ownership and leadership on pulling together and delivering sites in Grays (main urban area).
- Many of the Local Plan evidence base documents have been produced by other departments (outside of the Local Plan team) in the Council. Where there are expectations for other departments to produce Local Plan documents, this needs to be included in future Local Plan funding and resourcing plans. Also, some of the evidence base documents have not been managed properly, e.g. transport.
- There is a need to plan for Minerals and Waste for Thurrock, as a unitary authority.

- There are a number of technical officer skill gaps in the Council, e.g. ecology, flood and for the Minerals and Waste Local Plan.

5.5 Current Consultant Support to Local Plan

5.5.1 **Table 5.2** below lists all consultants that have either been commissioned or the Council are potentially planning to commission, to undertake Local Plan evidence base studies. The majority of those listed below have already been commissioned.

Table 5.2: Current List of Consultants Working on Thurrock Local Plan

| Consultancy | Local Plan Evidence Base or Support |
|--|---|
| AECOM | Strategic Flood Risk Assessment (SFRA) Stage 1 Strategic Flood Risk Assessment (SFRA) Stage 2 Water Cycle Study (WCS) Stanford Le Hope Surface Water & Flood Alleviation Studies |
| Arup | Detailed Green Belt Assessment Energy Strategy update Infrastructure Delivery Plan |
| David Lock Associates (DLA) | Interim Housing Site Assessment Study |
| City Science | Strategic Transport Model |
| Ekosgen | Economic Development Needs Assessment (EDNA) Update Freeport Alignment Scoping Study |
| Essex County Council (ECC) | BNG Guidance Local Nature Recovery Strategy (LNRS) |
| HDH Planning & Development Ltd | Local Plan Viability Report |
| Place Services (Essex County Council (ECC)) | Assessment of Settings – Thurrock SAMs Comprehensive Historic Assessment |
| Lambert Smith Hampton (LSH) | Employment Land Availability Assessment (ELAA) Update |
| Land Use Consultants (LUC) | IIA, including SA, SEA HRA Open Space Assessment Study Green and Blue Infrastructure Strategy (GBI) |
| Mott MacDonald | Thurrock Parking Policy and Strategy |
| ORS | Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (GTAA) Buckles Lane Accommodation Assessment (GTAA) |
| Richard Latcham Associates | Strategic Transport Policy – Draft Movement Chapter |

| Consultancy | Local Plan Evidence Base or Support |
|---|---|
| | Mass Rapid Transit (MRT) Opportunity / Feasibility Study? |
| Ridge | Advisors/Critical Friend on Strategic Transport Model Local Plan Transport Assessment |
| Stantec (previously PBA) | Strategic Green Belt Assessment Gypsy and Traveller and Travelling Showpeople Site Assessment Study Current Local Plan Review |
| Steer | Bus Services Improvement Plan (BSIP) (now completed) |
| Transport Initiatives and Urban Movement | Local Cycling and Walking Infrastructure Plan (LCWIP) |
| Turley's | Housing Needs Assessment (HNA) Update |

- 5.5.2 However, there are a number of Local Plan evidence base studies that have not yet been assigned to a consultancy, other department or Local Plan officer to produce, such as the Centres Study, which will include retail and commercial leisure needs assessment.
- 5.5.3 The full list of evidence base studies and current progress is set out in **Table 3.2** above.
- 5.5.4 There are four further recommendations that have resulted for team interviews and other meetings, as follows:
- Work with consultants to produce and agree a Brief and Project Plan for new Local Plan evidence base studies being produced by consultants. Agree Briefs and Project Plan with Local Plan Manager before any work commences;
 - Each evidence base document needs to have a clear Local Plan officer 'owner', so as to ensure consultants are managed efficiently and outputs are agreed and delivered to programme. The Local Plan officer 'owner' should manage (or input into) all Briefs, Project Plans, Methodologies and draft Reports;
 - The Local Plan Manager and/or Local Plan Project Manager needs to manage ALL Local Plan evidence studies, have regular progress meetings with evidence base 'owners', check key documents, such as Briefs, Project Plans, Methodologies and Draft Reports, as well as attend meetings with consultants, when required; and,
 - It is essential to build in time in the overall Local Plan programme for consultants to submit fee proposals and be instructed, so that there is time for purchase orders and Works Orders to be put in place. Thurrock Accounts and Legal departments need to sign-up to undertaking these tasks within a defined/agreed period, so that it can be worked into the overall Local Plan programme.

5.6 Member Involvement in the Local Plan

Introduction and Role of PAS

- 5.6.1 The Planning Advisory Service (PAS) Report was undertaken between 30 October – 2 November 2023 and produced 11 recommendations, of which 3 related to Member involvement in the Local Plan process, namely R4, R8, R9 and R10 (which are set out below). These recommendations were followed by Strategic Service team workshop on 22 January 2024 to provide further commentary on these recommendations.

5.6.2 These 4 recommendations are set out below along with commentary from senior management and team members:

- **R4: Ensure the new Local Plan is promoted corporately and politically as the primary tool to drive housing and regeneration delivery in Thurrock.** Political leaders from all parties should ensure that all members understand that the Local Plan is the delivery tool for future growth in Thurrock. This is likely to involve 6-monthly reporting to SLT and Cabinet on infrastructure contributions and its delivery and to recruit an Infrastructure Funding Officer, i.e. so limited involvement of Members. It also relies on the Corporate Plan but is dependent on community buy-in and meaningful engagement. Actions should include Member training, updates on the IDP and timeframes, buy-in from Members to the importance of the Local Plan, which needs promotion. It was considered that the Local Plan Task Force (see below) was not effective and poorly attended.
- **R8: Improve the efficiency and effectiveness of the Planning Committee.** This work involves a Members training programme, externally or internally. A comprehensive set of training sessions, including mandatory training for new Committee Members, following the elections in May 2024, which his should also include interactive officer/ Member training.
- **R9: Agree and communicate a set of cultural behaviours across the Council that seek to build trust and confidence among officers and Members and partners.** With support from the LGA and PAS these should provide a collective agreement of how the behaviours will translate into actions. This would involve producing an Officer/Member protocol, steered by SLT, to determine how communication is best achieved and by whom; and would be followed by a workshop on behaviours and culture. It was noted that Members did not usually attend Planning or Local Plan Hearings or Enquiries.
- **R10: Work with officers and Members to co-design a targeted and structured planning training programme for elected members.** With RTPi/PAS advice, this should provide members with of the Planning Committee with a clearer understanding of the planning balance and the skills and confidence they need as well as upskill local ward members on their own role in the planning process. This could be delivered by PAS, the RTPi, external consultants or internally. It suggests that following 'all out' elections in 2025, Planning Committee Members should have a series of mandatory training sessions that would need to be attended before Members can sit on the Planning Committee. This would involve the Chief Planning Officer and Members in devising a suitable programme of training in concert with the training provider.

5.6.3 It is clear, especially now that the most recent local elections in May 2024 have been held and there is a new local government and Members, that this time offers an opportunity to develop much stronger ties between officers and Members and more knowledgeable/experience Members, in respect of planning and the Local Plan.

Local Elections and the Corporate Plan

5.6.4 The latest local elections on 2 May 2024 returned a Labour administration in Thurrock and following the full Council meeting on 21 May 2024 has provided the details of the Leader and Cabinet Members, as set out below and can be found: [The Cabinet and its members | Cabinet | Thurrock Council](#).

- **John Kent** – Leader of the Council and Cabinet member for strategic relationships, reputation and influence
- **Lynn Worrall** – Deputy Leader and Cabinet member for overall change and improvement agenda
- **Vikki Hartstean** – Cabinet member for Children's Services

- **Victoria Holloway** – Cabinet member for Place and the Environment
- **Mark Hooper** – Cabinet member for Health and Well-being
- **Valerie Morris-Cook** – Cabinet member for Community Partnerships
- **Sara Muldowney** – Cabinet member for Resources
- **Lee Watson** – Cabinet member for Good Growth

5.6.5 In May 2025, it is intended that local elections in Thurrock are ‘all-out’, which may have repercussions for Members and the Council that are currently unknown, but some change is expected.

5.6.6 Prior to the latest local elections there was a Local Development Plan Task Force – [Committee details - Local Development Plan Task Force | Thurrock Council](#). Although the last three meetings (December 2023 and January and March 2024) were cancelled, there were only 9 meetings held since July 2021, with a further four meetings postponed. The PAS Report refers to this Task Force as not effective or well attended. This Task Force was ceased/discontinued at the full Council meeting on 20 March 2024. Despite being briefed in September 2023 of Local Plan proposals, it did not meet to approve the IPD for consultation, which was undertaken and approved by full Council on 6 December 2023.

Current Proposals

5.6.7 The Corporate Plan, 2024 – 2029 is scheduled for determination by full Council at its meeting on 24 July 2024, but will be published in advance. It will set the tone and direction for the Council for the coming few years and be refreshed annually and especially following the 2025 ‘all-out’ local elections.

5.6.8 It is acknowledged by Local Plan team members that Members have not had a good understanding of planning and of the Local Plan and need further training. In addition to the Director of Place, Members need to ‘own’ and champion the Local Plan, ideally the relevant Portfolio Holder and also be brought through the Local Plan production process, from now until its adoption in addition to the proposed training programme.

5.6.9 The creation of a new, all-party Local Plan Working/Project Group (LPWG) has been suggested in early 2024. Unfortunately, there are no details yet of its establishment, Terms of Reference (ToR) or Membership, although an example ToR for West Suffolk LPWG (of 3pp) is being considered and is available as an example of best practice and these details are set out below.

5.6.10 **West Suffolk LPWG** – it was being established to support Cabinet in the development of the Local Plan, reviewing matters in depth, assessing a wide range of evidence and providing a range of thoughts, opinions and recommendations for Cabinet to consider. The specific role and purpose of this LPWG is sixfold, as set out below.

- Advise on the development of Local Plan documents, through reviewing and commenting on the associated evidence base and draft documentation;
- Review consultation responses, assessing how these should inform policy preparation and how the local plan should be influenced by responses;
- Support the Council in its duty to consult with its partners, including other local authorities, in the development of the Local Plan, evaluating their proposals and how these shape / influence policy developments, particularly with regard to cross-boundary issues;

- Evaluate how the Local Plan is compliant with national planning policy guidance and good practice;
- Evaluate consultation approaches, advising on potential methods and options to ensure effective engagement. Support the Portfolio Holder for Planning in monitoring the delivery of the project timetabled,
- Undertake other roles that the Portfolio Holder for Planning, in consultation with the Chair, considers appropriate.

5.6.11 As part of its initial work, it would be necessary to establish a Work Programme, reviewed at each meeting, to guide and monitor the work undertaken. It is proposed to comprise 10 Members, including the Portfolio Holder for Planning and Councillors from all political groups and membership would be apportioned in line with political balance. A quorum was considered as 4 Members and frequency is determined by the Work Programme.

5.6.12 In addition to performing their collective role, members of the LPWG will be expected to undertake the following:

- Act as a champion for engagement with the Local Plan development process, promoting consultations with local community groups, residents and stakeholders and attending in person and virtual consultation events where able to do so;
- Engage with their political groups to ensure all members are kept informed on the local plan development process;
- Keep informed of national and local developments and legislation that may impact on the work of the group;
- Actively participate in debates at the Working Group meetings;
- Be creative, supporting new ideas coming forward and being open minded to alternative proposals or viewpoints;
- Read and consider papers presented in advance of the meeting, being proactive in contacting officers to resolve any points of confusion ahead of the meeting; and,
- As mentioned above, they will use their experience, knowledge and insight of their local area, but be mindful of the need to consider the plan across the whole area.

5.6.13 There would also be offer support, led by the Strategic Planning Manager and Chief Planning Officer, supported by their officers. The LPWG would only be advisory with no decision-making powers.

Recommendations

5.6.14 Bearing in mind the above context and background and that the PAS recommendations have become Council policy, we set out below six key recommendations for consideration.

- a. Set up the Local Plan Working/Project Group (LPWG) during Summer 2024, with its first meeting in September 2024, using and agreeing ToR broadly in line with the above best practice example;
- b. Ensure a Membership of 12 - 15 elected Members, which would be quorate with four Member attendees and it should meet monthly. It is further suggested that membership also include a Thames Freeport representative, two public and two landowner/business representatives, as with other previous Working Groups, such as the LTC Task Force;

- c. Establish a Work Programme by the second meeting, advised by senior officers, which will involve briefing from officers monthly on progress;
 - d. Ensure all Members of this LPWG and other key Cabinet Members attend a soon-to-be established training programme for the coming year;
 - e. Appoint a Member 'champion' for the Local Plan (possibly the relevant Portfolio Holder) and encourage support from other Members; and,
 - f. This LPWG will issue regular (monthly) updates to both the Planning Committee and full Council of its actions, recommendations and progress on its Work Programme, although it is recognised that governance lead-times are 2-3 months for full Council and an alternative mechanism to inform Council may be required.
- 5.6.15 These recommendations and the foregoing context should be considered following a Cabinet Paper at the earliest opportunity.

5.7 Local Plan Organisational Structure

- 5.7.1 The Council provided Stantec with the previous/current Team Structure Chart for the Local Plan team and other related officers within the Strategic Services department, who manage or produce studies for the Local Plan, which is set out in **Figure 5.2** below (dated March – June 2024).
- 5.7.2 Following the review of existing Local Plan team, other officers who manage or produce studies for the Local Plan, Stantec sets out the recommended Local Plan team structure, management and other officer support in **Figure 5.3** below. These recommendations have been discussed with the Chief Planning Officer, however, it is acknowledged that these recommendations are made without knowledge of the current planning services restructure.
- 5.7.3 Furthermore, it is important to note that the following recommended new Strategic Planning Team Structure is based on the assessed technical requirements necessary for effective delivery of the Local Plan and has not accounted for any budgetary constraints. Furthermore, the proposed structure has been guided by three overarching principles:
- To ensure there are adequate resources, at the right level, to deliver the Local Plan according to a revised LDS timetable, but ensuring the evidence studies are completed, suitable scenarios developed, and a Preferred Option is development that are sound for a Regulation 19 publication;
 - To ensure proper integration of all key technical functions within the Strategic Planning team to produce a sound Local Plan; and,
 - To not downgrade existing posts if to do so might cause the current postholder to resign, when that person is a strongly valued member of the team.

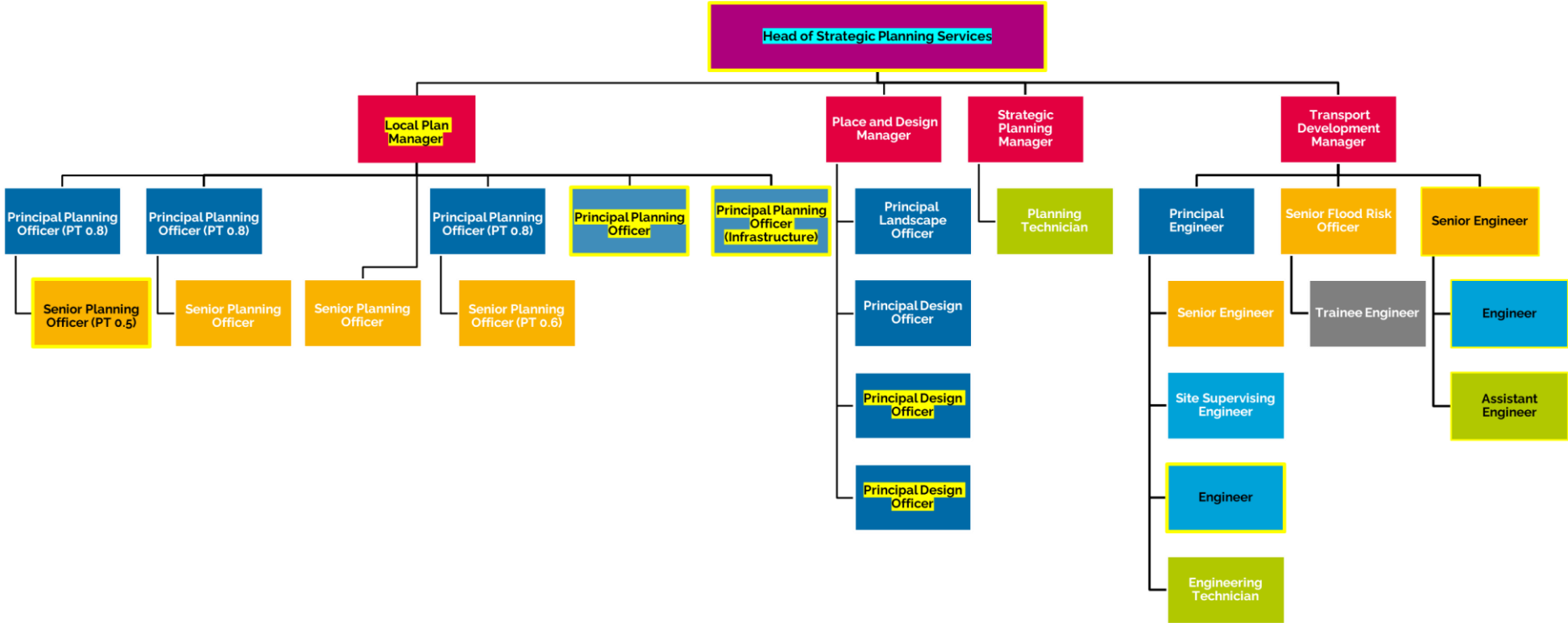
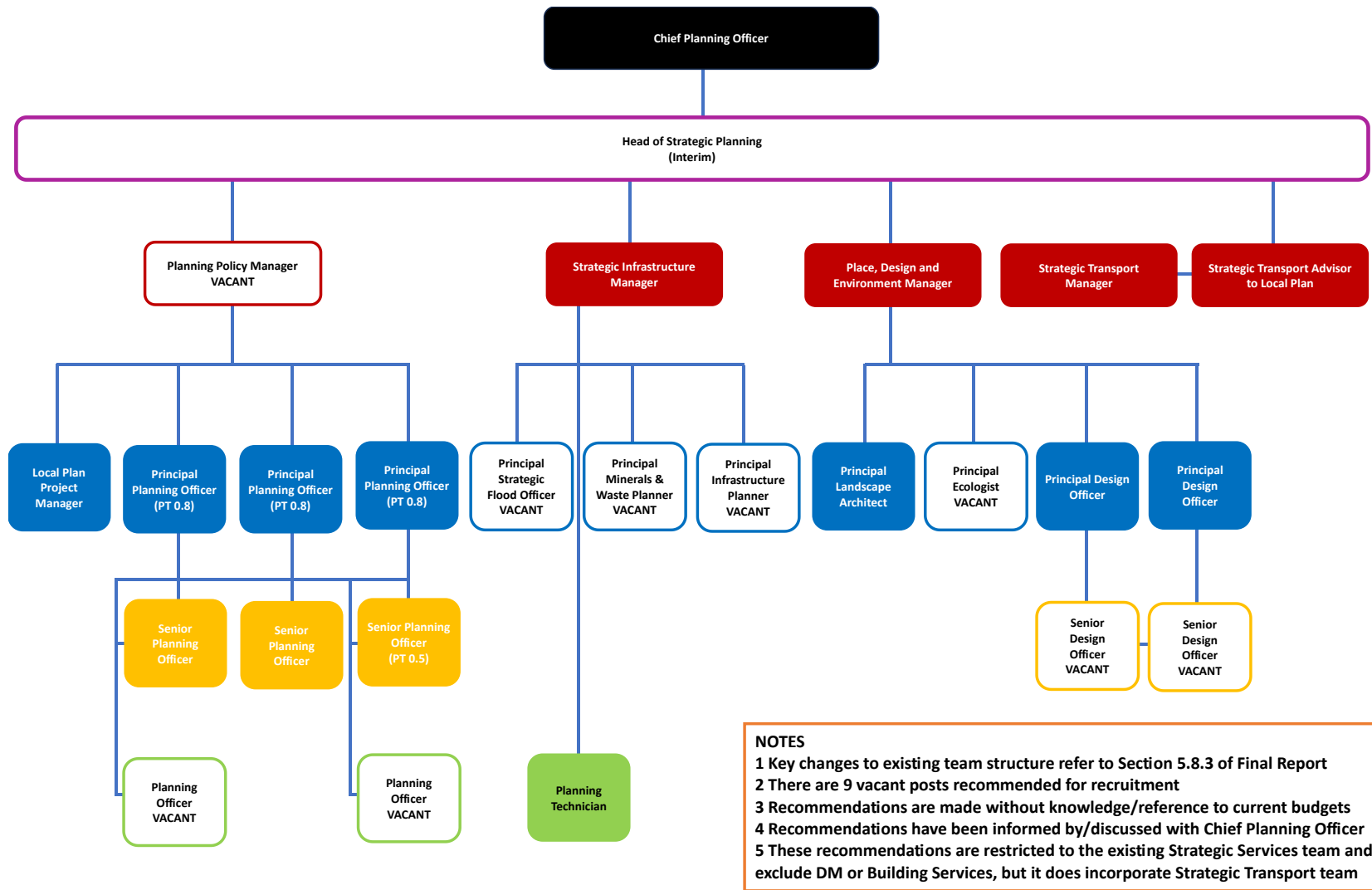


Figure 5.2: Previous/Current Local Plan and Wider Team Organisational Chart (March - June 2024)



NOTES
 1 Key changes to existing team structure refer to Section 5.8.3 of Final Report
 2 There are 9 vacant posts recommended for recruitment
 3 Recommendations are made without knowledge/reference to current budgets
 4 Recommendations have been informed by/discussed with Chief Planning Officer
 5 These recommendations are restricted to the existing Strategic Services team and exclude DM or Building Services, but it does incorporate Strategic Transport team

Figure 5.3: Recommended Local Plan and Wider Team Organisation Chart (notwithstanding Planning Services Restructure or Budgets)

5.7.4 **Local Plan Team management:**

- Recruit a Head of Strategic Planning and Implementation (Interim) – this has now been completed and an Interim Head of Strategic Planning joined the Council on 4 June 2024.

5.7.5 **Local Plan Team individual team members:**

- Recruit a Planning Policy Manager – currently vacant and following appointment make the Interim Local Plan Project Manager role a permanent role. The Interim role of Local Plan Project Manager is currently being undertaken through Stantec.
- Recruit 2 Planning Officers to support each Local Plan Principal Planning Officers – currently vacant.

5.7.6 **Strategic Infrastructure Planning Team:**

- Recruit a Principal Mineral and Waste Planner – currently vacant.
- Recruit a Principal Flood Risk Officer – currently vacant.
- Recruit a Principal Infrastructure Officer – currently vacant.
- Add a Planning Technician role to support the Principal Officers - – currently vacant.

5.7.7 Recommendations for the Place, Design and Environment Team and Strategic Transport Teams only relate to Local Plan tasks, which is set out in the paragraphs below. This report does not provide comment on the need for further staff relating to any other Council tasks, which are undertaken by those teams.

5.7.8 **Place, Design and Environment Team Services:**

- Ensure this team is more closely working with Local Plan team to ensure Local Plan becomes more design-led, especially on Design Codes, studies for key areas (Grays, Lakeside, Purfleet and involvement in Towns Fund, etc), potentially leading on more evidence studies.
- Recruit a Principal Ecologist/BNG Specialist – currently vacant.
- Reduce Principal Design Officer to Senior Design Officer – currently vacant.

5.7.9 **Strategic Transport**

- Ensure the Strategic Transport team is brought into the Strategic Planning Team's aegis, given its role in managing the Strategic Transport Model, preparation of the LTP4, Local Plan Transport Assessment and other key evidence studies that are critical to the Local Plan.
- Use the Transport Development Manager as Strategic Transport Advisor to support the Strategic Transport team, given his long Council experience and expertise.

5.7.10 Existing roles and responsibilities for each role are set out in **Section 5.8** below.

5.8 Local Plan Team Members: Future Roles and Responsibilities

5.8.1 **Appendix D.2** (dated March 2024) sets out the existing roles and responsibilities for all the existing staff identified in **Figure 5.2** above. Then, set out below are the principles

underpinning and then the key recommended proposed additional or changed Local Plan responsibilities.

5.8.2 The five recommended principles underpinning the future roles and responsibilities are, as follows:

- a. The existing roles and responsibilities for each team member needs to be simplified and limited to 3 topic/thematic areas only;
- b. Team members should provide a monthly work programme look ahead and weekly reports of progress to their relevant Manager;
- c. Working days and contact details for each Member need to be centrally available and easily accessible;
- d. All evidence studies must be preceded by agreed Technical Briefs and a Works Order and then be project managed weekly; and,
- e. Priorities must be set monthly and rolled forward for each team member's workload.

5.8.3 The key changes and additions to the existing roles and responsibilities set out are summarised below for each staff member for the wider Local Plan team, as follows:

- **Head of Strategic Planning** – overseeing all workstreams, LDS management, project management and setting direction; and Developers Forum.

Local Plan

- **Programme/Project Manager** – project management of 10 priority evidence studies and liaison on LDS programme; and Finance.
- **Principal Planning Officer** – Housing and Health and Wellbeing; and Local Plan Reg 18 consultation liaison.
- **Principal Planning Officer** – Employment and Economy and Retail, Centres and Area Studies.
- **Principal Planning Officer** – Sports, Playing Pitches and Open Space; Green Belt, Natural Environment, Landscape, Biodiversity and Green Space; and Climate Change and Energy.
- **Senior Planning Officer** – Heritage and Culture; Major Projects liaison (and support to Principal Planning Officer).
- **Senior Planning Officer** – support for Retail, Centres and Area Studies (and Principal Planning Officer).
- **Senior Planning Officer** – Placemaker, PPAs, Website and supporting Comms role and digital support; and support for Developers Forum.

Strategic Infrastructure Planning

- **Strategic Infrastructure Manager** – Flooding and Water; Minerals and Waste; Infrastructure, Delivery and Viability; and Gypsies and Travellers.
- **Planning Technician** – support function as existing.

Place, Design and Environment

- **Place, Design and Environment Manager** – Built Environment and Design and Borough-wide Design Code.
- **Principal Landscape Architect** – Landscape Character, BNG Guidance.
- **Principal Design Officer** – completion of Urban Capacity Study, Area Studies (SPADFs), Support to Amy Linford.
- **Principal Design Officer** – Support and master plans/concept studies, Lakeside Public Realm Improvement Plan.

Strategic Transport

- **Strategic Transport Team** – Strategic Transport Model, LTP4 and range of other transport evidence studies.
- **Transport Development Manager** (in addition to Transport Development Manager role) – Strategic Transport advice.

5.8.4 In addition, staff will become responsible for specific areas, now based on PCN boundaries and these will need allocation soon. When the evidence studies are nearing completion, each team member will be required to prepare draft elements of the Regulation 19 Local Plan document.

5.8.5 The new vacant posts for two Planning Officers, a Principal Infrastructure Planner, Principal Strategic Flood Officer, Principal Minerals and Waste Planner, Principal Ecologist and two Senior Design Officers will also require roles and responsibilities established once in post.

6 Task F: Summary of Thurrock's Communities Views Over Time

6.1 Introduction

6.1.1 Task F was to provide a review and summary of all relevant formal consultations undertaken for the Local Plan since 2016. The Task is set out in more detail within **Appendix E** and as subsequently developed and agreed with the Council and is set out below in more detail.

Task F: Summary of Thurrock's Communities Views (covering public, businesses, developers, landowners and key statutory/local consultees) Over Time

- *Sub Task 1 – Review Issues and Options Stage 1 Consultation Report*
- *Sub Task 2 – Review Issues and Options Stage 2 Consultation Report*
- *Sub Task 3 – Community Planning Days/Design Charettes Review*
- *Sub Task 4 – Review Initial Proposals Document Consultation Report*
- *Sub Task 5 – Review of statutory and local consultee engagement to date (now incorporated within the above work)*

This element of the work is made up of three separate, but connected parts:

- a) *Review of the Issues and Options Stage 1 and 2 Consultation Reports (September 2016 and December 2018 respectively) (as referred to above);*
- b) *Community Planning Days (Design Charettes) documentation (as referred to above); and,*
- c) *Through officer interviews/workshop it is necessary to determine how statutory consultees, key local bodies have been involved to date and if there are plans for subsequent technical engagement.*

This work will also be undertaken at a preliminary level to isolate key matters of significance to the public throughout the last few years under both topic heading and by main locations.

It will also be necessary to review the results of the current Initial Proposals Consultation that concluded on 19 February 2024 and understand the Council's proposals for their analysis and the production of the Report of Consultation, i.e. it is assumed that a Consultation Report will be produced by the Council and will be available to Stantec to review within this 3-month commission. However, this report has not yet been provided and a section has been provided for both below and in the Technical Note Appendix E that will need to be prepared at a later date; and, will an update to the 77no 'Key Issues of Significance' set out within Section 9 and summarised below.

Sub Task % - Statutory and local technical engagement with various consultees, has been undertaken over recent years, during this foregoing Local Plan work, and it has been documented (wherever possible) to identify key issues and matters of significance for each consultee. This work has been incorporated within the details set out below and not separated out.

Deliverable F: a report setting out the key findings for review by Council officers to ensure all relevant matters are captured, with recommendations for future actions to form part of the work to Regulation 19.'

- 6.1.2 Following this review, a total of 77no. **'key matters of significance'** have been identified to relate to stakeholder comments within both Issues and Options consultation reports (Stage 1 and Stage 2) and arising from feedback expressed at the events of the Community Planning Days/ Design Charrettes.

6.2 Review of Issues and Options 1 Consultation Report (2016)

- 6.2.1 Within the scope of this review, the **Issues and Options Consultation (Stage 1)** represents Thurrock Council's consultation and first formal invitation for stakeholders to provide responses towards what the Thurrock Local Plan ought to contain as required by legislation. The Issues and Options Stage 1 Report of Consultation identified and highlighted both formal comments and 'Burning Issues' consultation events commentary.
- 6.2.2 The feedback received towards the Local Plan Stage 1 consultations can be viewed as a split between strategic level and local level responses. Within Local Plan consultation documents Thurrock Council identified groupings of stakeholders, distinguishing between 'Duty to Cooperate bodies', 'Landowners, Businesses and Developers', and 'Local Residents and Community Groups'. There are commonly arising concerns that are broadly repeated at various consultations, which include the following:
- a. Addressing existing health inequalities and impacts;
 - b. Delivering upon the homes and related infrastructure and regeneration needs of areas;
 - c. A brownfield development preference whilst taking into account their value and ability to deliver;
 - d. Individual duty to cooperate matters to be agreed and discussed at later Plan-making stages;
 - e. Identifying evidence requirements and documents for the Local Plan;
 - f. Addressing parking requirements for residents and lorries;
 - g. Segregating industry that impacts health from homes;
 - h. Understanding Thurrock's Green Belt relationships; and
 - i. The implications of Lower Thames Crossing and other nationally or regionally significant projects and strategies in Thurrock.

6.3 Review of Issues and Options 2 Consultation Report (2018)

- 6.3.1 Within the Plan-making process the **Issues and Options Consultation (Stage 2)** represents Thurrock Council's further iteration of the Local Plan that is now able to take into account consultation responses (Stage 1) on what ought to be contained in the Local Plan. Therefore, Stage 2 consultations are considered to be the iteration upon, and accumulation of considerations of Stage 1 and further evidence produced since prior consultations were held.
- 6.3.2 The significant amount of feedback provided at consultations addressed or raised concern to matters that relate to the need to improve community health and well-being, either through infrastructure, design, green space, community and health, children's education or other forms of facilities and provisions, including housing. Key matters are raised to various aspects of the Local Plan, including the following broad topics:
- a. Housing, including Travellers;

- b. Employment & Economy;
- c. Transport;
- d. Retail, Centres and Rural Settlement/Area Studies;
- e. Sports, Playing Pitches and Open Space;
- f. **Flooding** and Water;
- g. Green Belt, Natural Environment, Landscape, Biodiversity and Green Space;
- h. Climate Change and Energy;
- i. Built Environment & Design;
- j. Infrastructure, Delivery and Viability; and,
- k. Minerals and Waste.

6.3.3 The identification of key issues presented in Thurrock Council Local Plan consultations consistently receives broad support from respondents, whilst adding further key considerations. Whilst detailed in later sections of this report there exist key matters that are broadly repeated at various consultations, which include:

- a. Affordable, local, and housing needs for all (youth & older age, special needs) and in full;
- b. The need for local authorities to maximise joint working, as required by legislation;
- c. Robustly addressing the need/ impact of development and supporting infrastructure;
- d. Retaining, improving and providing new health, community and leisure facilities;
- e. Lorry, HGV and freight impacts, movement and transportation;
- f. Managing flood risk and water environments;
- g. Protecting and enhancing character and heritage assets;
- h. Regeneration and improvement of existing places, public realm, green, health & community infrastructure;
- i. Reviewing and protecting important Green **Belt**;
- j. Addressing anti-social behaviour and improving safety;
- k. Ensuring needed infrastructure is delivered and the plan as a whole is viable and robustly underpinned;
- l. Improving air quality;
- m. Improved retail and leisure provisions that do not negatively impact other centres;
- n. Reducing carbon emissions, encouraging renewable energy and addressing climate change;
- o. Creating well-designed, community spaces; and,

- p. Securing the minerals and waste facility needs of the area.
- 6.3.4 Areas where particular opportunity or need for regeneration / growth and additional stakeholder engagement was undertaken included: Aveley; Bulphan; Chadwell St Mary; Corringham; East Tilbury; Grays; Horndon on the Hill; Orsett; South Ockenden; Stanford le Hope; and Tilbury.
- 6.3.5 Key matters raised applying to the areas of additional engagement are reflected in the Council's Issues and Options (Stage 2) report of consultations and set out below:
- a. The need for housing (specifically affordable, social, and adaptable for older residents);
 - b. Concerns over air quality;
 - c. The desire for more or better gym and sport facilities;
 - d. The need to address traffic congestion and gridlock;
 - e. The need to protect natural landscapes for enjoyment and for ecology;
 - f. The desire for better community facilities including more GP services;
 - g. A greater and more visible police presence including an increased frequency of police patrols in the evenings;
 - h. The re-routing of HGV's away from residential areas and village centres;
 - i. An improved network of walking and cycle paths; and,
 - j. Additional bus routes, more frequent services and increased rail capacity.

6.4 Design Charettes Review (2019 – 2022)

- 6.4.1 Between 2019 and 2022 Thurrock Council held design workshops (hereafter 'Design Charettes') in towns and villages across Thurrock (Aveley, Bulphan, Chadwell St Mary, Corringham East Tilbury, Horndon on the Hill, Orsett, South Ockenden and Stanford-le-Hope) with the intention to allow for local people to be involved in planning their community's future.
- 6.4.2 It is understood that the locations to hold design charette events were chosen due to the amount of land that was being promoted for development within each area as part of the Local Plan process and to better understand the issues and opportunities that might arise from more development in these areas. The locations were the following: Aveley, Bulphan, Chadwell St Mary, Corringham, East Tilbury, Horndon-on-the-Hill, Orsett, South Ockendon and Stanford-le-Hope.
- 6.4.3 The Design Charette events followed a pilot event in Aveley (2020) and thereafter follows a consistent approach. The approach and format of planning days results in 4no. opportunities to receive local community feedback at each location. Feedback is understood to have been received during or following:
- a. Q&A moments (design charrettes);
 - b. A virtual tour (design charrettes);
 - c. Breakout workshops (design charrettes); and
 - d. Separate public drop-in session

6.4.4 The Technical Note Appendix E set out the results (topics and concerns) from these Design Charettes for each settlement area in detail. However, in summary the broadly consistent matters raised include the following:

- a. Infrastructure needs ranging from health, education and leisure to public transport, movement and accessibility;
- b. Preservation and enhancement of existing character and heritage features;
- c. The affordable and local area housing needs;
- d. Concerns over flood risks;
- e. Existing limitations for local employment;
- f. Habitat protection from development impacts and improvement;
- g. Concerns over anti-social behaviour; and,
- h. The impact of the implementation of the Lower Thames Crossing DCO.

6.4.5 The Design Charrettes reports further highlight locationally specific key matters, including:

- a. At Aveley, an identified struggle for established communities to stay in the area;
- b. At Bulphan, road safety and BMV agricultural land are also key;
- c. At Chadwell St Mary, landscapes are particularly impacted mineral extraction sites and losses of public realm are experienced;
- d. At Corringham, there exists potential for 'lift and shift' and a need to ensure a new train station/ halt is viable;
- e. At East Tilbury, acknowledgement of the mixed-use Bata redevelopment opportunities and the need to address commuting patterns;
- f. At Horndon on the Hill, a strong existing sense of place and community, rising house prices and opportunities for 'land swaps';
- g. At Orsett, the village's effective 5-minute walking catchment, Orsett Hospital closure and encouragement for a mass rapid transit scheme;
- h. At South Ockenden, maximisation of access to the rail station, limitations to local retail and dependency on Lakeside, as well as reducing carbon emissions; and,
- i. At Stanford le Hope, private car use dominance and commuter patterns, high levels of children living in poverty, as well as the 2025 planned closure of Orsett Hospital.

6.5 Review of Initial Proposals Document Consultation Responses (2023)

6.5.1 Thurrock Council held further consultations on the 'Local Plan – Initial Proposals Document' (IPD) and its accompanying Integrated Impact Assessment (IIA) from 18 December 2023 until 19 February 2024. It was the most recent consultations and represented Thurrock Council's formal Regulation 18 consultation. The IPD sets out how the Local Authority area might grow, change and adapt over the next 15-20 years alongside a series of alternative options.

- 6.5.2 The IPD consultations represent the first Local Plan consultations subsequent to the decision of the Association of South Essex Local Authorities (ASELA) to no longer progress with a statutory Joint Strategic Plan (JSP, 2021/22). Therefore, key matters that would have fallen within the remit of the JSP may be added to matters that now need to be addressed by the emerging Local Plan or may result in a stronger emphasis of matters in the absence of a strategic plan.
- 6.5.3 The Initial Proposals document sets out information about the suggested structure of the emerging Local Plan. It also includes information about Thurrock Council's initial proposals for how places in the Local Authority area might grow, change, and adapt over the next 15-20 years alongside a series of alternative options.
- 6.5.4 Statutory consultees (such as the Environment Agency (EA), Natural England (NE), Historic England (HE), National Highways (NH), etc.) have responded to all Local Plan consultations to date and these responses are partly summarised above and in full in Appendix E, but there needs to be greater clarity going forward on the involvement of such critical consultees in order to clarify their comments and ensure they are incorporated in the Local Plan going forward.
- 6.5.5 SUMMARY RESULTS TO BE ADDED LATER, WHEN AVAILABLE FROM COUNCIL and UPDATE 'KEY MATTERS OF SIGNIFICANCE' (even after Final Report and may include further commentary on the IIA).

6.6 Previous Consultations – Local Plan Key Matters of Significance

- 6.6.1 This review has considered the documentation of consultation responses within the Issues and Options (Stage 1) Report of Consultation, the Issues and Options (Stage 2) Report of Consultation and the Community planning day (Design Charettes) reports.
- 6.6.2 The purpose of this review is to isolate '**Local Plan Key Matters of Significance**' to stakeholders at a high level. The Issues and Options (Stage 2) Consultation document included 'Figure 6: Draft Key Issues and Challenges', which broadly received support as identifying key considerations for the Thurrock Local Plan and are reflected in the below list in addition to matters raised in responses. This review has resulted in the identification of additional '**Key Matters of Significance**' and considers the broadness of and any other matters, as set out in the methodology above. This has consequently resulted in an expanded list of matters that are important for stakeholders.
- 6.6.3 A key part of preparing the Local Plan requires the understanding of land that is available to meet the needs of the area. The process of identifying sites and their availability for development is typically progressed by the respective Local Planning Authority by way of a 'Call for Sites'. The Call for Sites is begun at an early stage in the plan-making process inviting stakeholders to put forward broad areas of land for potential inclusion in the emerging Local Plan. Thurrock Council initiated their first Call for Sites prior to the Issues and Options (Stage 1) Consultation and by the time of the next Stage 2 Consultation (December 2018-March 2019) and following two further Call for Sites exercises more than 250 sites (as stated in the I&O2 document, page 12) were submitted for consideration in addition to any already considered or submitted as planning applications. Sites submitted were suggested for a wide range of uses to meet Thurrock's future housing, gypsy and traveller, employment, retail, leisure, and waste and minerals needs. There is no formally set deadline for suggesting a site, therefore the number and understanding of sites continues to expand at each formal stage of the plan-making process and builds upon key inputs provided at Developer Forum events and engagements held by Thurrock Council's Strategic Services.
- 6.6.4 The identified '**Key Matters of Significance**' set out for the various stakeholders have been drawn together from respective consultations and attributed to the respective topics, resulting in 78 'key matters' that stakeholders expect the emerging Local Plan for Thurrock to consider and or address. These are:

Housing, including Traveller Sites

- HT01: Addressing affordable housing needs across the Local Authority area;
- HT02: Meeting the objectively assessed housing needs in full, incl. the housing need of local areas and people living in Thurrock;
- HT03: Addressing the need for housing in the context of a probable shortfall across the South Essex strategic housing market area, and past housing shortfalls;
- HT04: Appropriate housing mixes, enabling downsizing, special needs accommodation – taking into account local market evidence;
- HT05: Gypsy and Traveller needs, incl. the unmet Gypsy and Traveller needs of Basildon;
- HT06: A spatial strategy that robustly takes into account ‘reasonable alternatives’, such as going beyond existing urban areas, and sustainably distributes development;
- HT07: A housing strategy that includes a sufficient and appropriate mix in scales of development from small and medium to large-scale strategic; and,
- HT08: Housing allocations with supporting or in proximity to adequate sustainable transport, community and health infrastructure and away from industrial uses.

Employment and Economy

- EE01: Securing sustainable economic growth, enabling local labour growth and training;
- EE02: Enabling a sectoral change and diversification of attractive employment provision;
- EE03: The economic role of the river Thames and the delivery of the ‘Thames Vision;’
- EE04: Impacts of port expansions and future operations on local and cross-boundary areas;
- EE05: Securing and communicating benefits of port expansions to Thurrock local areas;
- EE06: Maximisation of economic benefits arising from Lower Thames Crossing; and,
- EE07: Addressing industrial and logistics local needs and impacts, as well as accounting for evidenced cross-boundary employment requirements.

Transport

- T01: Appropriate siting and number of dedicated lorry parks;
- T02: Strategic transport infrastructure needs & impacts, including Lower Thames Crossing;
- T03: Relieving strategic and local road networks congestion and gridlocks and enable alternative transport solutions, including rail and waterways;
- T04: Improving access to services, facilities and employment opportunities;
- T05: Focusing on road safety and pedestrian movement and crossings;

- T06: Cross-boundary commuter relationships and addressing any unsustainable commuter patterns; and,
- T07: The retention and improvement of existing public transport provision.

Retail, Centres and Rural Settlements/Area Studies

- RCAS01: Creating and maintaining vibrant and competitive town centres, especially Grays Town Centre;
- RCAS02: The cross-boundary retail impacts of Lakeside;
- RCAS03: Assessing areas for their key impacts, before recommending the most optimal or alternative uses;
- RCAS04: Establishment of a 'town centres first' approach and appropriate retail hierarchy;
- RCAS05: The comprehensive assessment of all local and cross-boundary retail relationships, needs and opportunities;
- RCAS06: Creation of an evening economy and attractive uses to young people, particularly in Grays;
- RCAS07: Place management and maintenance, safety and the avoidance of anti-social behaviour;
- RCAS08: Parking provisions within local and town centres; and,
- RCAS09: Regeneration and diversification of town centres with complementary and supporting leisure uses.

Sports, Playing Pitches and Open Space

- SPO01: The need for public open spaces and sports facilities;
- SPO02: Enhancement and maintenance of existing public open spaces and sports facilities;
- SPO03: Cross-boundary impacts on needs and opportunities for sports facilities and open space provision;
- SPO04: Enabling opportunities for destination and spectator sports where they enhance and benefit communities;
- SPO05: The need for safety focused children's play spaces; and,
- SPO06: Providing indoor and outdoor youth facilities, as well as older age and encouraging activities.

Flooding and Water

- FW01: Steer new development to areas with the lowest risk of flooding;
- FW02: Managing water environment quality, cycle and treatment of wastewater;
- FW03: Cross-boundary impact on the River Thames and River Mardyke;

- FW04: Accounting for the limited existing water resources of Thurrock;
- FW05: Safeguarding land for the retention and improvement of flood defence infrastructure;
- FW06: Strategic flood defence raising and cross-boundary impacts; and
- FW07: Overall flood risk management and mitigation, including SuDS.

Green Belt, Natural Environment, Landscape, Biodiversity and Green Space

- GNLBG01: 'Priority Species or Habitats', protected sites, and habitats of value, with special attention to those on brownfield sites in Thurrock;
- GNLBG02: Securing measurable biodiversity net gain and improvements in the natural environment;
- GNLBG03: Best and most versatile agricultural land;
- GNLBG04: Air quality improvement and reduction of pollution impacts on communities and vulnerable nature conservation sites;
- GNLBG05: A full/ finer grain Green Belt review;
- GNLBG06: Improving the environmental quality and accessibility of the Green Belt and ensuring long-term defensible Green Belt boundaries;
- GNLBG07: Cross-boundary coordination and the cumulative impact of development;
- GNLBG08: Retention of existing green infrastructure assets and green spaces; and,
- GNLBG09: An enhanced to green infrastructure networks and improved accessibility.

Climate Change and Energy

- CCE01: Allocate sufficient land for renewable energy facilities; and,
- CCE02: Reduce carbon emissions and mitigate impacts of climate change.

Built Environment and Design

- BED01: The need for better parking provision, particularly in town and local centres;
- BED02: Improving the attractiveness of the Local Authority area as a place to live, work, visit and invest;
- BED03: Improved movement and accessibility networks to all users, including delivery of an enhanced Public Rights of Way (PRoW) network;
- BED04: Evidencing and justifying policy standards taking into account the need & viability;
- BED05: The conservation and enjoyment of historic environments, including heritage assets most at risk;
- BED06: Establishment of National, Local, Landscape and Seascape Character Assessments;

- BED07: Climate resilient building designs, incl. water and energy efficiency, and carbon reductions;
- BED08: Preventing threats to the character and local distinctiveness of the Local Authority area;
- BED09: Health Impact Assessments at plan-making and/or large site application stage; and,
- BED10: Estates and community regeneration, and high standards of design.

Infrastructure, Delivery and Viability

- IDV01: Meeting existing and future health infrastructure needs and tackling local health inequalities;
- IDV02: A full Local Plan and policies assessment of viability;
- IDV03: Enhancement and retention of existing, as well as provision of new community, education, and public transport infrastructure;
- IDV04: Meeting existing and future education infrastructure needs (incl. early years), taking into account cross-boundary pupil movement and impacts;
- IDV05: Meeting existing and future community infrastructure needs;
- IDV06: Infrastructure and Housing Deliverability assessments, particularly reviewing brownfield site capabilities and a review of existing allocations;
- IDV07: Infrastructure funding and phasing of delivery (including digital, strategic flood defences and the Strategic Road Network (SRN) improvements) and cross-boundary impacts;
- IDV07: Viability of port and marine operations via supporting infrastructure and growth;
- IDV08: Alternative funding mechanisms, public sector intervention and enabling of sites capable of sustainable development, including 'lift and shift'/ 'land swaps'.

Mineral and Waste

- MW01: Providing sufficient waste management facilities and providing for future mineral and aggregate needs; and
- MW02: Meeting strategic cross-boundary minerals and waste unmet needs identified through the duty to cooperate

6.6.5 There are three further key matters of significance identified, which do not readily fall within topics and rather relate to the Local Plan approach itself or plan-making procedure requirements. These include:

- PM01: Promoting and enhancing community health, cohesion and well-being as an important 'golden thread'.
- PM02: The need for the Local Plan to be based on robust and up-to-date evidence; and,
- PM03: The Duty to Cooperate with local planning authorities and prescribed bodies.

- 6.6.6 In addition, for the purposes of ‘soundness’ and legal compliance, the cooperation with persons identified in section 33A must be demonstrably ‘maximised’ and ‘have been dealt with rather than deferred’. Moreover, in accordance with current Plan-making Planning Practice Guidance paragraph 31, the duty to cooperate and associated requirements to cooperate ‘cannot be rectified post-submission’ and is therefore particularly key at stages prior to submission.
- 6.6.7 Notwithstanding the above analysis and recommendations, it is vital that the Local Plan team should be supported by central Council departments (PR/Press, website, marketing/graphics teams/event organising) in the future Regulation 19 consultation – this may also involve the use of additional and appropriate software to assist in dealing with subsequent consultation responses, which should be commissioned later in 2024 or early 2025. Undertaking these tasks is very time consuming and should be done by the appropriate departments. This will ensure the following:
- That the Local Plan and wider team can concentrate on the Local Plan Regulation 19 production (particularly the evidence studies initially);
 - Creating consultation and website update text, as required, but using appropriate software where necessary;
 - The Local Plan team must control the technical input to the PR/Press Releases, Council website on Local Plan updates, event organising, etc., but be fully supported by the appropriate central Council departments; and,
 - The PR, Press Releases, Local Plan Website Updates and marketing must be proactive and properly project managed to ensure efficient delivery.

7 Task G: Review of Existing Integrated Impact Assessment (IIA)/Sustainability Appraisal (SA) for the Local Plan

7.1 Introduction

7.1.1 Task G was to provide a review and summary of the Integrated Impact Assessment (IIA) of the Regulation 18 IPD document. The full details of the review are set out below, which was subsequently developed and agreed with the Council. The scope of the review is set out in the contract and is set out below.

‘Task G: Sustainability Appraisal, including SEA

- *Sub Task 1 – Review existing Initial Proposals Document (IIA) and its relationship to Sustainability Appraisal (SA)/ Strategic Environmental Assessment (SEA) Regulations.*
- *Sub Task 2 – Identification of ongoing SA/SEA work.*

Given the IIA ([Sustainability appraisals | New Local Plan for Thurrock | Thurrock Council](#)) prepared by the Council for its latest Initial Proposals Document, it will be necessary to first check that the IIA meets the requirements at Regulation 18 and all other legal requirements) and then undertake a SA (or SEA) of the emerging Local Plan during its preparation (iteratively). Suitably qualified staff, as part of the overall team, to assess work undertaken so far, scope future work and then undertake this process during preparation and prior to adoption of the Local Plan will be necessary.

In addition to the previous work on SAs in 2016, 2018 and 2019 (found on the Council’s website – [Sustainability appraisals | New Local Plan for Thurrock | Thurrock Council](#)), it will be necessary to understand the current IIA for the Regulation 18 Local Plan and how it should be developed into the appropriate SA for the Regulation 19 Draft Local Plan.

Section 19 of the Planning and Compulsory Purchase Act 2004, sets out requirements for SA under the Environmental Assessment of Plans and Programmes Regulation, 2004 (as amended) and in accordance with Government guidance ([Strategic environmental assessment and sustainability appraisal - GOV.UK \(www.gov.uk\)](#)). SA is a complex and legalistic process and should be undertaken iteratively, alongside the preparation of a Local Plan. In the UK, SA incorporates the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the ‘SEA Regulations’). SEA is also a statutory assessment process, originally required under the European SEA Directive, transposed in the UK by the SEA Regulations and amended by the Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232) and the Environmental Assessment of Plans and Programmes (Amendment) Regulations 2020 (SI 2020/1531). As set out in the Explanatory Memorandum accompanying the Brexit amendments, they are necessary to ensure that the law functions correctly following the UK’s exit from the EU. No substantive changes were made by this instrument to the way the SEA regime currently operates. Therefore, the SEA Regulations remain in force.

The Levelling up and Regeneration Act (LURA), which received Royal Assent in October 2023 contains legal provisions to reform SEA and brought in enabling powers to allow the creation of Environmental Outcomes Report (EOR) to replace EIAs and SEAs. However, until secondary legislation is in force the assessment regime remains as it is. The Government has recently announced that the regime will be changed in 2025 at the earliest, which may include the preparation of an EOR, which will be after the next election and may or may not be

brought forward. Therefore, the Council should continue to plan for an SEA of the Local Plan as an ongoing stream of work throughout the process from now until adoption.

Deliverable G: this will be an ongoing report necessary to meet the requirements of the legislation and guidance, i.e. we will review and confirm what more needs to be done to ensure how to bring it in line with the Regulations, but not undertake an SA on the work to date.'

- 7.1.2 This review has evaluated the Integrated Impact Assessment (IIA) of the Thurrock Local Plan Initial Proposals Document (IDP) and its relationship to Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) Regulations and the Habitats Regulations Assessment (HRA) (i.e. the Conservation of Habitats and Species Regulation 2017 (as amended)), the requirements of the Town & Country Planning (Local Planning) Regulations, 2012 (especially Regulation 18) and the Planning & Compulsory Purchase Act, 2004 Section 19(5). In addition, it will be necessary to understand the previous progression of SA work in 2016, 2018 and 2022. Finally, it makes recommendations for any actions required and the process going forward into Regulation 19.
- 7.1.3 This review was structured under the following headings, as set out below:
- Section 7.1 – Introduction
 - Section 7.2 – Approach to Review
 - Section 7.3 – List of Documents Reviewed
 - Section 7.4 – Compliance, Technical Adequacy & Identification of Further Work and Updates for the Sustainability Appraisal
 - Section 7.5 – Summary of Key Findings and Recommendations
- 7.1.4 Under Section 7.4, separate assessments are provided for the SA/SEA, Health Impact Assessment (HIA), the Equalities Impact Assessment (EqIA) and the HRA (although currently not commenced) components of the IIA taking into account policy compliance, methodology and technical adequacy and recommendations for further work or updates to the IIA.
- 7.1.5 A summary of overall findings and recommendations is provided in Section 7.5 below.

7.2 Approach to Review

- 7.2.1 An Integrated Impact Assessment (IIA) of the emerging Thurrock Local Plan was carried out comprising SEA, HIA and EqIA. The HIA and EqIA are presented as part of the SA and references to the IIA should be seen as incorporating SA, SEA, HIA and EqIA elements.
- 7.2.2 It should be noted that Section 1.25 and 1.26 of the IIA acknowledges the following:
- 'The requirement to undertake HRA of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in 2007. The currently applicable version is 'The Conservation of Habitats and Species Regulations 2017 (SI 2017/1012), as amended by 'The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579)' (hereafter referred to as the 'Habitats Regulations'). When preparing the Local Plan, the Council is therefore required by law to carry out an HRA. The Council can commission consultants to undertake HRA work on its behalf and this (the work documented in separate HRA reports) is then sent to and considered by the Council as the 'competent authority'. The Council will consider the HRA and may only progress the Local Plan if it considers that it will not adversely affect the integrity of any European site or have a significant effect on qualifying habitats or species for which the European sites are designated for, or if Imperative Reasons of Overriding Public Interest (IROPI) are identified. The requirement for authorities to comply with the Habitats Regulations when preparing a Plan is also noted in the Government's online Planning Practice Guidance.'*

The HRA will be undertaken separately but the findings will be taken into account in the IIA where relevant, for example to inform judgements about the likely effects of potential development locations on biodiversity.'

- 7.2.3 Consequently, it is noted that future iterations of the IIA will take into account findings from an HRA, required in accordance with the Conservation of Habitats and Species Regulation 2017 (as amended). An HRA has not yet been undertaken due to insufficient detail at Local Plan Regulation 18 stage, however, it is intended that HRA screening will commence during the next stage of Local Plan development. The 2023 IIA report states that a separate HRA will be undertaken with findings reflected in the IIA.
- 7.2.4 This review provides a review of the IIA and its supporting Appendices. The outcome of the review is summarised below, which identifies policy compliance, technical adequacy, evidence considered, and any further work required.
- 7.2.5 This review has considered the following key questions:
- Does the IIA meet the requirements at Regulation 18 stage and all other legal requirements?
 - Does the IIA have a robust methodology, and does it provide a robust assessment relevant to SA/SEA, HIA and EqIA?
 - How does the current IIA take into account previous SAs in 2016, 2018 and 2019?
 - How should the current IIA be developed into an appropriate SA for the Regulation 19 stage of the Local Plan?
 - What further work needs to be undertaken to ensure Regulatory compliance and robustness?
 - Are the spatial options assessed sufficiently robust? Would significant changes to housing numbers make the IIA unsound at Examination?

7.3 List of Documents Reviewed

- 7.3.1 The following documents have been reviewed:
- Creating Successful Places Local Plan – Initials Proposals Document Regulation 18 (December 2023);
 - Thurrock Local Plan Sustainability Appraisal Scoping Report: Appendices (February 2016);
 - Integrated Sustainability Appraisal of the Thurrock Local Plan: Issues and Options (Stage 2) (December 2018);
 - Integrated Impact Assessment for Thurrock Local Plan, Scoping Report (June 2022);
 - Integrated Impact Assessment of the Thurrock Local Plan Initial Proposals Consultation Document, Regulation 18 Stage (November 2023); and,
 - Integrated Impact Assessment of the Thurrock Local Plan: Initial Proposals Consultation Document, Appendices (November 2023) Inclusive of:
 - Appendix A – Consultation Responses
 - Appendix B – Policy Context

- Appendix C – Baseline Information
- Appendix D – Site Assessment Framework
- Appendix E – IIA of the six spatial options
- Appendix F – Comparative assessment of the six spatial options
- Appendix G – IIA of the vision, strategic priorities and settlements
- Appendix H – Equalities Impact Assessment.

7.4 Compliance, Technical Adequacy & Identification of Further Work and Updates for the Sustainability Appraisal

Policy Compliance (Relevant SA and SEA Regulations)

- 7.4.1 The requirements of Regulations appear to have been met, although a Non-Technical Summary should have been provided and will be needed in future and will be provided at the Regulation 19 stage.
- 7.4.2 The IIA (or Sustainability Assessment (SA)) included requirements of Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA).
- 7.4.3 The section below presents recommendations on the methodology and technical adequacy of the IIA, including recommendations for further work and updates. These are intended to enhance the robustness of the IIA as it progresses towards the Regulation 19 stage.

Sustainability Assessment (including Strategic Environmental Assessment, SEA)

Methodology and Technical Adequacy

- 7.4.4 Overall, the methodology used regarding the IIA appears robust and is in alignment with SA guidance ([Strategic environmental assessment and sustainability appraisal - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/612222/Strategic_environmental_assessment_and_sustainability_appraisal_-_GOV.UK.pdf)). It is noted in paragraph 1.13 that:
- *'This report also fulfils a number of purposes additional to SA, to more comprehensively address the topics of equalities (via an Equalities Impact Assessment – EqIA) and health (via a Health Impact Assessment – HIA), as described under the headings below. From here on, the term 'IIA' should therefore be taken to mean 'SA incorporating the requirements of the SEA Regulations, EqIA and HIA.'*
- 7.4.5 The approach to integrate the HIA and EqIA within the overall SA, alongside the requirements of the SEA regulations is considered proportionate.
- 7.4.6 Regarding incorporating the HIA into the SA, it is agreed that an integrated approach is acceptable, and that the IIA objectives broadly align with a wider determinants of health model. Generally, changes to the IIA scope and framework are clearly addressed in the 2023 IIA report and preceding scoping reports, including how the IIA has responded to consultation responses.
- 7.4.7 The EqIA is a standalone assessment (presented as an appendix to the main report), which assesses the different spatial options. This is considered to be an acceptable approach to assessment given the level of detail provided at Regulation 18 Stage of the Local Plan. However, it is unclear how this assessment relates to the assessment made for IIA Objective 5: Equalities, which also references the Equality Act (and Public Sector Equalities Duty).

- 7.4.8 It is noted in Appendix H of the IIA, Paragraph H.15 that 'the criteria applied to the appraisal of options as part of the EqIA differ from the criteria applied to the appraisal of options as part of the Sustainability Appraisal in the main IIA Report; therefore, the effects identified are not the same between the two assessments.' However, IIA Objective 5: Equalities, states that it is based on the Equality Act and Public Sector Equalities Duty requirements.
- 7.4.9 It is recommended that clarity is provided at Regulation 18 stage on where the Public Sector Equality Duty (PSED) is met and if reference to the Equalities Act should be removed from the IIA.
- 7.4.10 Given that the EqIA is presented as the main evidence of meeting the PSED duty it is expected that this will be updated alongside the Local Plan development and future detailed assessments of options at Regulation 19.
- 7.4.11 There has been adequate inclusion and reference to the previous SA reports published regarding the development of the Local Plan to this stage (2016, 2018, 2022). The IIA scoping reports all present an appropriate methodological approach for the IIA, inclusive of SA, SEA, HIA and EqIA components.
- 7.4.12 While the HIA topics assessed remain broadly consistent across the scoping reports, there is inconsistency in the application of assessment approaches. Specifically, between the 2018 and 2022 scoping reports where the NHS London Healthy Urban Development Unit (HUDU) Rapid HIA is used to provide an assessment. Using the HUDU assessment tool was not included in the 2022 report, or the IIA. Therefore, making it unclear at this stage the assessment portion of an HIA is integrated into the IIA. It is recommended that clarity is provided regarding where this assessment takes place within the IIA at Regulation 18 before progressing to Regulation 19. It is noted, however, that this issue is explained in the IIA Scoping Report prepared in May 2022 and finalised in July 2022; and then summarised in Chapter 2 of the IIA Main Report and responses to the Scoping Report are included in Appendix A, which, together with the July 2022 Scoping Report (Parts 1 and 2), should be checked during the next stage of work.
- 7.4.13 The baseline and policy review provided across the SA uses an up-to-date, publicly available data, including population projections and is deemed to be comprehensive.
- 7.4.14 The assessment of the Spatial Options within the IIA (Appendix E) draws in likely wider impact pathways resulting from each housing option to form its overall assessment. For example, the likely impact of housing options on access to health infrastructure, green space, connectivity, air quality etc. It is noted in the assessment that given the detail within the options appraised a more specific assessment of the wider infrastructure is needed to support the plan at this stage is unfeasible. Therefore, this approach, which takes a broad view of potential wider impacts is reasonable. It is recommended that further assessment of the wider infrastructure provision (such as health care, education, green space and transport) is developed alongside the development of the Local Plan. Furthermore, it should be noted that the options assessed may not be the correct ones or the options adopted in the Regulation 19 proposals going forward and should be used with care in future.
- 7.4.15 It is noted in the presentation 'Thurrock Infrastructure Delivery Plan: Members Briefing' March 2023 ([Infrastructure Delivery Plan Presentation.pdf \(thurrock.gov.uk\)](#)) that a draft Infrastructure Delivery Plan, which will be published alongside the Regulation 18 Local Plan, for public consultation. This has not been published and reference in not made to it in the IIA.
- 7.4.16 It is stated that 'Uncertainties are dealt with in IIA by adopting a precautionary approach, wherein the worst-case scenario is assumed unless reliable evidence suggests otherwise.' This is a reasonable approach; however, clarity is needed on what the implications are for the spatial options in terms of housing provision as laid out below.
- 7.4.17 **MAJOR ISSUE:** it is unclear in the IIA why the housing numbers assessed within the Spatial Options differ from those within the Local Plan IDP, the below outlines the following discrepancies:
- Option 1: IDP reports 31,330 homes, the IIA reports 22,326 homes

- Option 2: IDP reports 39,800 homes, the IIA reports 32,276 homes
- Option 3: IDP reports 32,000 homes, the IIA reports 26,071 homes
- Option 4: IDP reports 31,000 homes, the IIA reports 22,376 homes
- Option 5: IDP reports 24,200 homes, the IIA reports 21,626 homes

7.4.18 The key documents to refer to regarding this major issue are: Creating Successful Places Local Plan – Initial Proposals Document Regulation 18, December 2023, page 19; and, Integrated Impact Assessment of the Thurrock Local Plan Initial Proposals Consultation Document Regulation 18 stage, November 2023, Chapter 2 Methodology, Table 2.1: Spatial options and quantum of development, pages 46-49, further pages 50-52.

7.4.19 Either a rationale will need to be provided explaining the discrepancies at Regulation 19 stage, or these will need to align. Some options have significant difference (Option 1 – 4), which will impact the consideration of IIA objectives, including potential need for wider social infrastructure. Furthermore, it is understood that the growth scenarios and spatial options are not based on robust and sound evidence. Therefore, it is likely that these will change in the future. Consequently, the IIA/SA/SEA assessment of the options may be incorrect and will need to be reassessed when more appropriate growth scenarios and spatial options are confirmed (based on robust evidence).

Identification of Further Work and Updates

7.4.20 The IIA present a summary of next steps relevant to the Local Plan development process. The report outlines (although note the commentary in Section 7.4.17 above):

- *‘The next stage in the Regulation 18 process will identify scenarios that represent different growth combinations based on the options appraised in this report. Once a preferred ‘growth scenario’ is selected, the potential development sites submitted as part of the ‘Call for Sites’ process will be appraised against the IIA Framework. In addition, strategic and development management policies will be drafted and subject to appraisal to determine their likely social, economic and environmental effects. The IIA will then be updated to reflect that version of the Local Plan and further consideration will be given to potential cumulative effects, mitigation measures as well as the approach to monitoring the likely significant effects of the plan’.*

7.4.21 These updates are agreed as necessary to ensure robustness at the next stage of the Regulation 18 process.

7.4.22 The following further work will be needed to ensure robustness at Regulation 19 Stage:

- The IIA will need to be amended if following consultation at Regulation 18 significant changes are made that substantially alters the plan or is likely to give rise to significant effects that have not been assessed. The IIA is considered an iterative document.
- Publication and integration of the planned Infrastructure Delivery Plan.
- Inclusion of Non-Technical Summary.
- The IIA states that the Council it has fulfilled the requirement to undertake formal Equality Impact Assessment (EqIA) under the provisions of the Equality Act (2010) and namely the Public Sector Equality Duty (PSED). This is achieved through an EqIA presented in Appendix F. However, it is recommended that clarity is provided under IIA Objective 5 Equalities to re-iterate that the PSED is being met through the EqIA reporting in Appendix F and not elsewhere in the Sustainability Appraisal (SA) / IIA reporting.

- Given that the EqIA is presented as the main evidence of meeting the PSED duty it is expected that this will be updated alongside the Local Plan development and future detailed assessments of options at Regulation 19.
- Therefore, making it unclear at this stage the assessment portion of an HIA is integrated into the IIA. It is recommended that clarity is provided regarding where this assessment takes place within the IIA at Regulation 18 before progressing to Regulation 19.
- Rationale will need to be provided explaining the discrepancies in housing numbers assessed for the Spatial Options between the IIA and the IDP at Regulation 19 stage, or these will need to align. Some options have significant difference (Option 1 – 4), which will impact the consideration of IIA objectives, including potential need for wider social infrastructure. Furthermore, it is understood that the growth scenarios and spatial options are not based on robust and sound evidence. Therefore, it is likely that these will change in the future. Consequently, the IIA/SA/SEA assessment of the options may be incorrect and will need to be reassessed when more appropriate growth scenarios and spatial options are confirmed (based on robust evidence).

Health Impact Assessment (HIA)

Methodology and Technical Adequacy

- 7.4.23 It is good practice to conduct a HIA when developing a Local Plan, in parallel with SA, however, this is not a statutory requirement. HIA can be integrated with the SEA and/or EqIA or it can be standalone. An integrated approach as used here is proportionate.
- 7.4.24 Regarding the incorporation of HIA into the SA, it is agreed that an integrated approach is acceptable and that the IIA objectives broadly align with a wider determinants of health model. It is currently unclear how the assessment portion of an HIA is integrated into the IIA and if a specific methodology such as the Healthy Urban Development Unit's Rapid Health Impact Assessment Tool, has been used to identify impact pathways.
- 7.4.25 In the HIA (Section 2.34), all IIA Objectives are listed as relevant to the HIA (with no impact designations given). However, within the explanation of the topics covered by the IIA Framework (Section 3.85) population and human health is referenced for IIA1- IIA10. Therefore, it is unclear if health has been considered directly in the assessment across the remaining IIA objectives.

Identification of Further Work and Updates

- 7.4.26 It is therefore recommended that clarity is provided regarding where exactly the assessment within the HIA takes place within the IIA at Regulation 18 before progressing to Regulation 19. It should be clearly stated where the HIA can be found within the assessment and if this should be considered under the population and human health topic.
- 7.4.27 Ensure that engagement is undertaken and integration with the Thurrock Council Public Health team to inform IIA as part of Regulation 18 and is integrated at Regulation 19 stage, particularly regarding inclusion of any health related policies or thresholds for HIA. It is not evident from the IIA that the Public Health officers have been consulted during the IIA process.

Equalities Impact Assessment (EqIA)

Methodology and Technical Adequacy

- 7.4.28 The 2023 IIA report states that the Equality Impact Assessment is located in Appendix F, however, this has been published in Appendix H. The Council should update future iterations to refer to the correct Appendix.

- 7.4.29 The EqIA has been presented as an appendix to the main report, assessing the spatial options only (noting that that the growth scenarios and spatial options are not based on robust and sound evidence. Therefore, it is likely that these will change in the future. Consequently, the IIA/SA/SEA assessment of the options may be incorrect and will need to be reassessed when more appropriate growth scenarios and spatial options are confirmed (based on robust evidence). With the IIA objective of 'Equalities' used in the assessment the objectives, spatial options and site appraisal. This is considered to be an acceptable approach to assessment given the level of detail provided at Regulation 18 Stage of the Local Plan.
- 7.4.30 The EqIA is considered to be an acceptable approach to assessment given the level of detail provided at Regulation 18 Stage of the Local Plan – notwithstanding comments in Section 7.4.28 above). However, it is unclear how this assessment relates to the assessment made for IIA Objective 5: Equalities, which also references based on the Equality Act (2011) (and Public Sector Equalities Duty).
- 7.4.31 It is noted in Appendix H, Paragraph H.15 that 'the criteria applied to the appraisal of options as part of the EqIA differ from the criteria applied to the appraisal of options as part of the Sustainability Appraisal in the main IIA Report; therefore, the effects identified are not the same between the two assessments.' However, IIA Objective 5: Equalities, states that it is based on the Equality Act and Public Sector Equalities Duty requirements.
- 7.4.32 The IIA states that the Council it has fulfilled the requirement to undertake formal Equality Impact Assessment (EqIA) under the provisions of the Equality Act (2010) and namely the Public Sector Equality Duty (PSED). This is achieved through an EqIA presented in Appendix F. However, it is recommended that clarity is provided under IIA Objective 5 Equalities to re-iterate that the PSED is being met through the EqIA reporting in Appendix F and not elsewhere in the SA/IIA reporting.
- 7.4.33 Given that the EqIA is presented as the main evidence of meeting the PSED duty it is expected that this will be updated alongside the Local Plan development and future detailed assessments of options at Regulation 19.
- 7.4.34 The IIA EqIA baseline is adequate and provides evidence relevant to most protected characteristic groups in addition to wider groups / themes relevant to the assessment.
- 7.4.35 Paragraph H.11 states that there is little baseline information available directly relevant to protected characteristics including gender reassignments and sexual orientation. Recommend that the baseline is updated to include data from the ONS 2021 Census, relevant datasets include TS070 – Gender Identity (detailed) and TS079 – Sexual Orientation (detailed).
- 7.4.36 Similarly in Table H.2 only neutral impacts have been identified for young and adult carers. It is likely that this group may be affected by similar challenges and benefits identified for people who have a disability given the high incidence. This is as most young carers live with the person that they are caring for and adult carers must provide a minimum of 35 hours per week to qualify for carers allowance. It is recommended that this assessment is amended to reflect these likely outcomes at Regulation 18 stage.
- 7.4.37 Paragraph H.21 states that 'Benefits are therefore also likely in terms of supporting social tolerance in the plan area and positive effects are expected in relation to gender reassignment, race and sexual orientation.' Recommend that future iteration of the IIA remove 'social tolerance' phrasing to avoid negative connotations. Phrasing could instead refer to social cohesion and opportunities for inclusivity or social participation.
- 7.4.38 It is acknowledged that the current IIA represents a high-level assessment based on the Regulation 18 Local Plan. The EqIA assessment should be updated to reflect further option development detail as the Local Plan proceeds to Regulation 19. Future iterations should more clearly define impact pathways relevant to different protected characteristic groups. For example, it is not clear how individual groups are affected by different aspect of proposed

development, so it is unclear if a certain group would be more or less affected than another. Clearer impact pathways for different protected characteristic groups will better enable the identification of suitable mitigation and monitoring actions.

- 7.4.39 H.55 – Consultation: Consultation with different protected characteristic groups and other sub-groups identified by the Council is encouraged. Recommend that local equality officers are engaged in the IIA to provide input on local equality issues during future iterations of the IIA.

Identification of Further Work and Updates

- 7.4.40 It is recommended that clarity is provided at Regulation 18 stage on where the PSED is met and reference to the Equalities Act is removed from the SA.
- 7.4.41 It is recommended that further detail is provided at Regulation 19 Stage regarding impact pathways on specific protected characteristics to be developed. This will better enable suitable mitigation to be identified, if required.
- 7.4.42 Recommend integration of any further consultation with local equality groups and input from the Council's equality officers to inform assessment and mitigation of impacts in future iterations of the IIA.
- 7.4.43 Recommend that the baseline is updated to include data from the ONS 2021 Census, relevant datasets include TS070 – Gender Identity (detailed) and TS079 – Sexual Orientation (detailed) at Regulation 18.
- 7.4.44 It is recommended that this assessment is amended to reflect these likely outcomes at Regulation 18 stage.
- 7.4.45 Recommend that future iteration of the IIA remove 'social tolerance' phrasing to avoid negative connotations. Phrasing could instead refer to social cohesion and opportunities for inclusivity or social participation.

Habitat Regulations Assessment (HRA)

- 7.4.46 It is noted that a HRA has not yet been undertaken due to limited detail on the preferred options at Regulation 18 stage. It is intended that HRA screening will commence during the next stage of Local Plan development.
- 7.4.47 Early analysis is recommended for the preparation of a HRA, though it is recognised that sufficient detail must be included in the plan to enable a meaningful assessment to be made. Once the HRA has been undertaken the IIA should be updated to reflect the findings of this assessment. The HRA should be updated alongside the IIA at any subsequent Local Plan development stages to confirm its continuing relevance and whether any recommendations or changes have been made and their implications. As a statutory consultee, Natural England must also be consulted as part of the HRA.
- 7.4.48 The end report should allow the competent authority for the purposes of the HRA to consider if the project (i.e. Local Plan) is likely to have a significant effect on the conservation objectives of the Natura 2000 (or European or Internationally Designated) sites or adversely affect the integrity of the conservation objectives of the Natura 2000 sites either alone or in combination with other plans and projects. It is recommended that the HRA is undertaken before the final stages of public consultation of the Regulation 19 Stage of the Local Plan and prior to the plan being taken to committee for approval as the consultation may lead to amendments of the plan.

7.5 Overall Summary of Recommendations

- 7.5.1 The IIA prepared for Regulation 18 Stage meets all regulations, including Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) Regulations, the requirements of the Town & Country Planning (Local Planning) Regulations, 2012 (especially Regulation 18) and the Planning & Compulsory Purchase Act, 2004 Section 19(5). The IIA presents a robust methodology demonstrating compliance with the regulations and provides an adequate assessment appropriate to the requirements at Regulation 18 stage – this is notwithstanding comments above concerning the growth scenarios and spatial options not being based on robust and sound evidence.
- 7.5.2 The approach to integrate the HIA and EqIA within the overall SA, alongside the requirements for SEA is considered proportionate. The IIA also incorporates and makes reference to previous SA reports published in 2016, 2018 and 2022, regarding the development of the Local Plan to this stage.
- 7.5.3 The future updates listed in Paragraph 6.2 of the 2023 IIA report are agreed as necessary to ensure robustness at the next stage of the Regulation 18 process, this is set out below:
- *‘The next stage in the Regulation 18 process will identify scenarios that represent different growth combinations based on the options appraised in this report. Once a preferred ‘growth scenario’ is selected, the potential development sites submitted as part of the ‘Call for Sites’ process will be appraised against the IIA Framework. In addition, strategic and development management policies will be drafted and subject to appraisal to determine their likely social, economic and environmental effects. The IIA will then be updated to reflect that version of the Local Plan and further consideration will be given to potential cumulative effects, mitigation measures as well as the approach to monitoring the likely significant effects of the plan’.*
- 7.5.4 A critical part of the ongoing IIA work must be closely related to the subsequent development of growth scenarios and spatial options (as set out above in **Section 3.14**). It is vital that these growth scenarios and spatial options are developed based on evidence and following a thorough IIA assessment.
- 7.5.5 It is vital that the Local Plan Programme (**Table 9.1**) is used to determine the IIA progress through to Regulation 19 and beyond, as it will ensure necessary IIA assessments of growth and spatial scenarios/options are undertaken at critical and appropriate times and such analyses/assessments necessarily feed into the selection of the preferred option for Regulation 19 publication.
- 7.5.6 While it is determined that the IIA meets the above regulations, some 15 additional recommendations have been made to strengthen the assessment as it progresses towards Regulation 19 stage. These are summarised below.

Summary of Identified Further Work and Updates

- 7.5.7 The IIA review has identified that the following 15 areas that require further consideration to ensure robustness at Regulation 19 Stage, these are summarised from the detailed findings presented in Section 4:
- The IIA will need to be **amended if following consultation at Regulation 18 if significant changes are made that substantially alters the plan or is likely to give rise to significant effects** that have not been assessed. The IIA is considered to be an iterative document.
 - Publication and **integration of the planned Infrastructure Delivery Plan** into the IIA.

- Future iterations of the IIA should include a **Non-Technical Summary**.
- As referred to in Sections 7.4.17 – 7.4.19 above, the rationale will need to be provided **explaining the discrepancies in housing numbers assessed for the Spatial Options between the IIA and the IDP at Regulation 19 stage**, or these will need to align. Some options have significant difference (Option 1 – 4), which will impact the consideration of IIA objectives, including potential need for wider social infrastructure. Furthermore, it is understood that the growth scenarios and spatial options are not based on robust and sound evidence. Therefore, it is likely that these will change in the future. Consequently, the IIA/SA/SEA assessment of the options may be incorrect and will need to be reassessed when more appropriate growth scenarios and spatial options are confirmed (based on robust evidence).
- It is unclear at this stage where the assessment portion of an HIA is integrated into the IIA. It is **recommended that clarity is provided regarding where the HIA assessment takes place within the IIA at Regulation 18 before progressing to Regulation 19**. It should be clearly stated where the HIA can be found within the assessment and if this should be considered under the population and human health topic.
- **Engagement should be undertaken with the Thurrock Council Public Health team** to inform the IIA as part of Regulation 18 and any feedback should be integrated at Regulation 19 stage, particularly regarding inclusion of any health related policies or thresholds for HIA. It is not evident from the IIA that the Public Health officers have been consulted during the IIA process, although it is understood that the Public Health team were consulted, although there is no overt record of that consultation included in the IIA documents..
- The IIA states that the Council it has fulfilled the requirement to undertake formal Equality Impact Assessment (EqIA) under the provisions of the Equality Act (2010) and namely the Public Sector Equality Duty (PSED). This is achieved through an EqIA presented in Appendix F of the IIA. (*NB: this is currently published in Appendix H, therefore this needs to update labelling*). However, it is **recommended that clarity is provided under IIA Objective 5 Equalities to re-iterate that the PSED is being met through the EqIA reporting in Appendix F** and not elsewhere in the Sustainability Appraisal (SA) / IIA reporting.
- Given that the EqIA is presented as the main evidence of meeting the PSED duty it is expected that this will be **updated alongside the Local Plan development and future detailed assessments of options at Regulation 19**.
- It is **recommended that further assessment of the wider infrastructure provisions required to support sustainable development for the spatial options** (e.g., healthcare, education, greenspace and transport infrastructure) is developed alongside development of the Local Plan.
- It is **recommended that further detail is provided at Regulation 19 Stage regarding impact pathways on specific protected characteristics**. This will better enable suitable mitigation to be identified, if required.
- It is **recommended that integration of any further consultation with local equality groups and input from the Council's equality officers is undertaken** to inform the assessment and mitigation of impacts in future iterations of the IIA at the Regulation 19 stage.
- **Recommend that the baseline is updated to include data from the ONS 2021 Census, relevant datasets include TS070 – Gender Identity (detailed) and TS079 – Sexual Orientation (detailed)** at Regulation 18.

- It is **recommended that this assessment is amended to reflect likely outcomes for young and adult carers** at Regulation 18 stage.
- **Recommend that future iterations of the IIA remove ‘social tolerance’ phrasing to avoid negative connotations.** Phrasing could instead refer to social cohesion and opportunities for inclusivity or social participation.
- **It is recommended that the HRA is undertaken before the final stages of public consultation** and prior to submission of the plan. **The IIA should be updated to take into account the findings of the HRA.**

7.5.8 It should be noted that there may have been commentary on the IIA and its process during the IPD (Regulation 18) Consultation. It will be important to review those comments and determine if additional issues should be added to the above list of areas requiring further consideration.

8 Task H: Current Status and Effects of Major Projects on the Local Plan

8.1 Introduction

- 8.1.1 Task H was to provide a review and summary to understand the current status and effects of key, identified major projects. The Task is set out in more detail within the Technical Note Appendix G and as subsequently developed and agreed with the Council and is set out below in more detail.

‘Task H: Understand the Current Status and Effects of Key, Identified Major Projects

- *Sub Task 1 – Review of DCOs: LTC, Norwich to Tilbury and Thurrock Flexible Regeneration Plant*
- *Sub Task 2 – Review LDOs – Thames Freeport*
- *Sub Task 3 – Review Regeneration Schemes, e.g. Purfleet*
- *Sub Task 4 – Review of TEP and other major development sites and status*

The Stantec team have a complete knowledge of the issues related to, documentation and the current status of the LTC project having worked on that project collectively for 3-5 years. However, other major infrastructure projects will need to be reviewed (as listed above), in concert with relevant Council officers, to understand their status, stage of development and their likely broad effects on the emerging Local Plan; together with identifying any Stantec conflicts at the earliest stage. These large-scale projects will have a marked effect of developing the Regulation 19 preferred option for the Local Plan and it is vital there is an understanding of and engagement with their promoters so as to ensure the Council is fully engaged.

It is noted that there are information sources on each project (as set out below, plus others to be determined) and there is already Council engagement with each project and relevant officers responsible, all of which will be examined. The main sources for these projects are the following:

- *LTC DCO – [Lower Thames Crossing | National Infrastructure Planning \(planninginspectorate.gov.uk\)](https://www.planninginspectorate.gov.uk)*
- *Norwich to Tilbury Project (previously East Anglia Green) – [East Anglia GREEN | The need for network reinforcement | National Grid ET](https://www.norwich.gov.uk)*
- *Thurrock Flexible Regeneration Plant – [Thurrock Flexible Generation Plant | National Infrastructure Planning \(planninginspectorate.gov.uk\)](https://www.planninginspectorate.gov.uk)*
- *Thames Freeport and its LDO – [Thames Freeport](https://www.thamesfreeport.com)*
- *Regeneration Schemes: Purfleet-on-Thames – [Outline plans for the regeneration area | Purfleet-on-Thames growth | Thurrock Council](https://www.thurrock.gov.uk)*
- *TEP Consent – [Overview | Thames Enterprise Park development | Thurrock Council](https://www.thurrock.gov.uk) and [Other major development sites/projects and their current planning status.](https://www.thurrock.gov.uk)*

***Deliverable H:** a report consisting of a series of Technical Papers on each relevant major project, its status, stage of development and potential effects on the emerging Local Plan, plus*

any initial recommendations regarding future actions. In addition, ensuring each major project is inserted onto a single map base to help identify obvious geographic impacts.'

- 8.1.2 **Appendix F** provides a review of the 12 key major infrastructure projects currently live across the Thurrock Council area. This includes all future and current Development Consent Orders (DCOs), Local Development Orders (LDOs) and major Town and Country Planning Act applications (TCPAs).
- 8.1.3 The purpose was to provide a full review of each of the 12 projects identified, in terms of their proposals, the current consents status, the likely impacts on Thurrock and a review of proposed mitigations recommendations for managing the impact of each development and their cumulative impacts, as well as identifying any strategic Local Plan impacts.
- 8.1.4 Following consultation with Thurrock Council, the following major projects were identified and main conclusions for each are set out below, with the full analysis set out in detail in **Appendix F**:
- F.1 – Thurrock Flexible Regeneration Plant (TFRP) DCO;
 - F.2 – National Highways: Lower Thames Crossing (LTC) DCO;
 - F.3 – National Grid: The Great Grid Upgrade – Norwich to Tilbury DCO;
 - F.4 – Thames Freeport and its LDO;
 - F.5 – Purfleet-on-Thames Growth/Regeneration Project;
 - F.6 – Thames Enterprise Park (TEP);
 - F.7 – Arena Essex;
 - F.8 – Corringham;
 - F.9 – East Tilbury;
 - F.10 – Grays Shopping Centre;
 - F.11 – Linford; and,
 - F.12 – West Horndon.
- 8.1.5 **Figure 8.1** below sets out the broad locations for all 12 major projects, which are also included in each project's assessment in **Appendix F** below.

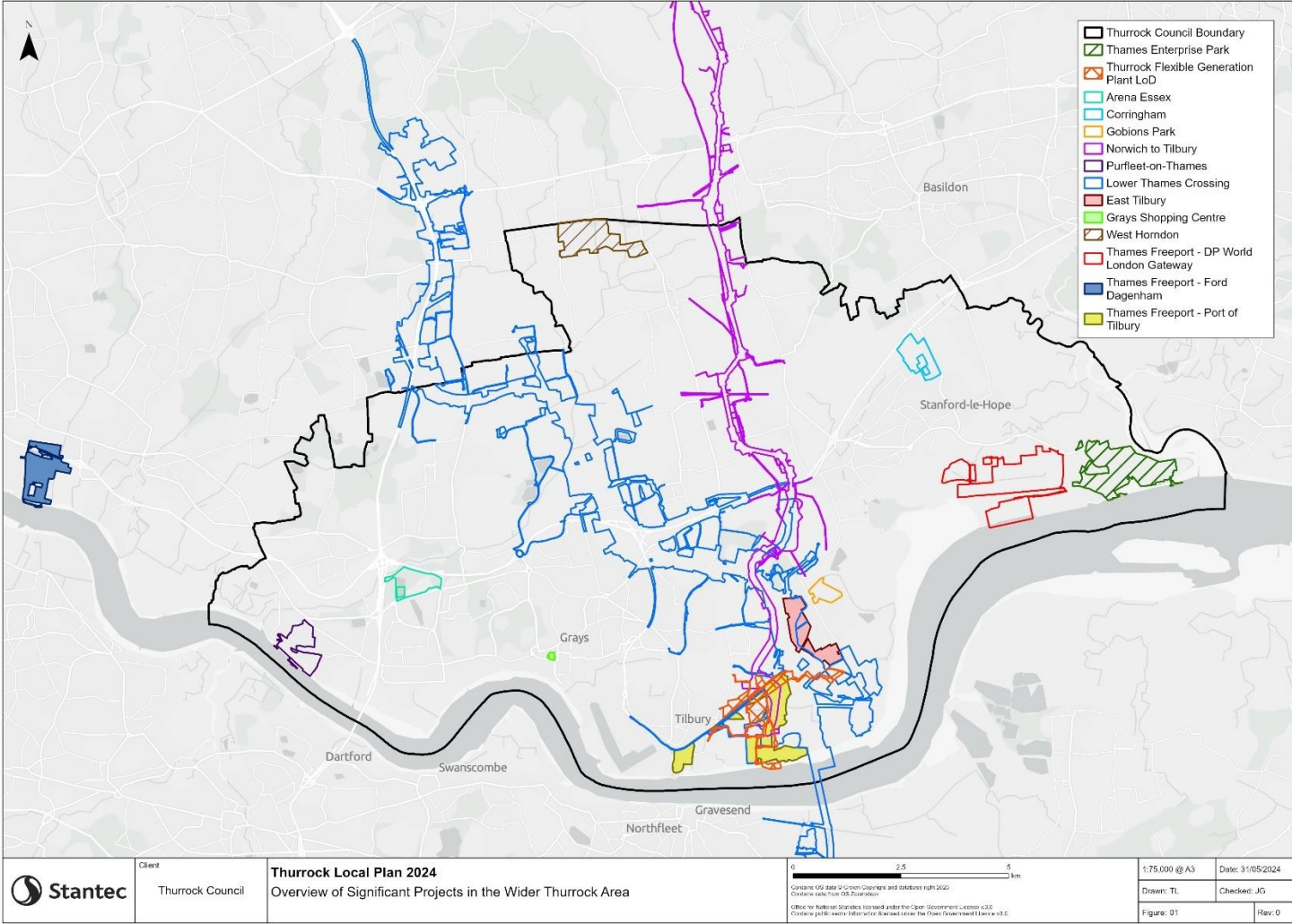


Figure 8.1: Composite of 12 Major Project Locations

- 8.1.6 Each project has been dealt with in its own section within a set structure that includes the following content:
- Project Overview and Plan;
 - Current Consents Status;
 - Potential Impacts to Local Plan and Management, which has been divided across the key topic areas, including Transport, Socio Economic, Housing, Air Quality, Noise, Flood Risk and Green Belt; and
 - Strategic Local Plan Impacts, largely dealing with overall impacts on developing a Local Plan.
- 8.1.7 In the formulation of the above inputs and full analysis use has been made of the Council's website, its planning application database, specific project websites and advice from Council officers. Therefore, it is possible that there are some limitations to the analysis, such as: proposals described may not be fully up-to-date, the analysis may have used information that is incorrect, analysis may only be high level and the detail is limited to just providing an overview of impacts, for example, the LTC project submissions to the DCO Examination contain much more detailed information than can be analysed within this Task H.
- 8.1.8 Consequently, the overall purpose of this Task H was to provide an overview of the scale and nature of the major development projects within the Council area, while providing a focus on the likely impacts and possible mitigation measures and the more strategic impacts on the Local Plan. This will assist in the overall recommendations provided in the full report and provides a better understanding of the effect of these major projects.
- 8.1.9 The Local Plan team will need to include a Local Plan policy for each strategic site (the full list to be concluded during the course of the Local Plan Regulation 19 production), but it could include these 12 sites and potentially others when the scenarios and Preferred Option for growth are confirmed.
- 8.1.10 The Local Plan team need to ensure that the information received on each of these 12 sites is fed into each of the Local Plan evidence base studies, as they will each have an impact and create housing and social infrastructure needs, both individually and cumulatively.
- 8.1.11 The summaries provided below largely contain information on likely topic-based impacts and the more strategic impacts on the Local Plan and further detail is contained in **Appendix F**.

8.2 Review of Development Consent Orders (DCOs)

- 8.2.1 Currently, there are three DCOs to consider, one approved, one awaiting a SoS decision and one just starting its Statutory Consultation process within the Pre-Application stage. The results of these are set out below in summary.

Thurrock Flexible Regeneration Plant DCO

- 8.2.2 The Thurrock Flexible Regeneration Plant would, if implemented, be a cutting-edge energy facility located in Thurrock, Essex. It is designed to be a flexible power generation plant capable of producing electricity from a variety of sources, including natural gas, biofuels and other renewable energy sources. The DCO was granted on 17 February 2022 and authorised the development, although a non-material amendment for its expansion was submitted in February 2024 and is not yet determined. It is understood that full construction has yet to commence, although a car parking facility has been installed; and, it is understood that there remain logistical challenges in securing an adequate water supply.

- 8.2.3 There could be a number of transport/traffic and environmental impacts, managed through the granted DCO, however, additional mitigations are suggested within the assessment of this project, including the effect that the implementation may have on Thurrock's housing supply and rental market.
- 8.2.4 As the DCO was made in 2022, the cumulative impacts and assessments were made at the time and will not have factored in the strategic development needs of Thurrock and arising from neighbouring authorities, as they are understood today. Assessments on the TFGP will therefore now be a factor in the baseline/ committed impact of subsequent development in Thurrock. Furthermore, the site may now require a change in land use allocation to be considered, possibly for specific employment use within the emerging Local Plan.

Lower Thames Crossing (LTC) DCO

- 8.2.5 LTC is at an advanced stage in the DCO process, with the Examination completed on 20 December 2023, the PINS Recommendation Report submitted by 20 March 2024, the SoS issuing 4 formal Consultation Letters and now the SoS decision delayed until 4 October 2024, currently. The project has a major effect on the Borough taking some 10% of its total land area and creating many local and strategic impacts, although the current Government decided on a two-year delay from approval to major construction commencing, possibly until 2026.
- 8.2.6 The Council engaged thoroughly in the full DCO process, especially the Examination stage and made 31 formal written submissions to PINS and attended all Hearings. The full analysis of this project in **Appendix F** sets out the 19 major concerns that the Council has with this project, especially regarding transport and traffic issues.
- 8.2.7 There are significant challenges for Thurrock associated with the Lower Thames Crossing project, as follows:
- a. Concerns about the accuracy of transport modelling and the likely impact on the local transport network;
 - b. Lack of adequate benefits to Thurrock;
 - c. Insufficient Requirements and inadequate Control documents;
 - d. Further measures required around significant environmental and health impacts and mitigations and also air quality and noise;
 - e. Inadequate provision for and improvements of active travel facilities;
 - f. Lack of consideration around effect on the emerging Local Plan; and,
 - g. Further work required in relation to utility works.
- 8.2.8 It is recommended that the Council maximise their statutory role through the DCO, post any grant, to exert the levels of control through the subsequent, more detailed approval and Requirement discharge process if the DCO is granted.

National Grid Norwich to Tilbury DCO

- 8.2.9 The project is a proposal by National Grid to upgrade the electricity transmission system in East Anglia between Norwich and Tilbury. The Project includes a new 400 kilovolt electricity transmission connection of approximately 184 kilometres in overall length, from Norwich Main Substation and Tilbury Substation via Bramford Substation. The Thurrock section of the route would consist of approximately 8.5km and would run in a southerly direction passed Bulphan to the west and Horndon on the Hill to the east. The overhead line would then head east,

before going south to cross the A13 to the north-east of Southfields. It would then head south to the west of Linford, where it would transition to underground cable at a proposed CSE compound to the north of the proposed Lower Thames Crossing. The underground cable alignment would then run south into Tilbury Substation. Proposals include works at Tilbury Substation to connect Norwich to Tilbury into the substation, including building new infrastructure on the western half of the site on existing National Grid operational land.

- 8.2.10 The project is currently within its statutory consultation stage, having already undergone two non-statutory consultations during 2022 and 2023, with an anticipated DCO submission in 2025. It has already submitted a Scoping Opinion in December 2022, with the PINS Scoping Report has not yet been issued.
- 8.2.11 Although at an early stage in the DCO process, this major project has the potential to create a range of potentially unacceptable impacts relating to transport/traffic, many environmental matters, Green Belt, housing and flood risk, which are set out in full in the analysis in **Appendix F**.
- 8.2.12 It potentially crosses over and clashes with LTC and may have impacts on the Thames Freeport and the TFRP. The volume of potential development within the Borough, including two other NSIPs, Thames Freeport and major consented TCPA developments, as well as this Project, over similar timeframes have the potential to have significant cumulative impacts on the Borough's environment and its community. It is therefore important that all parties/promoters understand the full scope of the proposed developments and a cumulative impacts assessment is undertaken for all projects. Thurrock Council should take a leading role in coordinating this activity. Finally, the Council must ensure a continuous and robust response throughout the DCO process and seek to include the appropriate mitigation measures that will ensure the holistic development picture within Thurrock is considered. Potentially a single, cumulative Local Impact Report should be considered, even if outside of the formal DCO processes, so the Council can properly understand the extent of these cumulative impacts.

8.3 Review of Local Development Orders (LDOs)

- 8.3.1 Here, there is one current and approved LDO and one potential LDO (or indeed a DCO) and the results of these are set out below in summary. The Council will need to allow for the emerging Local Plan to provide a robust strategy for the various schemes within the region in order to manage the cumulative impacts. This strategy should be used in order to set the guiding principles for the Norwich to Tilbury projects route and interaction with other projects.

Thames Freeport, including the LDO and/or future LDO/DCO

- 8.3.2 Thames Freeport is a newly established economic zone (in 2022) within Thurrock, designed to foster trade, boost investment, and stimulate economic growth. Within the Thames Freeport area are three designated tax sites: Land near the existing Port of Tilbury; DP World/London Gateway; and, Ford Dagenham, although the Council is a part of the partnership organisation, together with LB Havering and LB Barking and Dagenham. The aim is to leverage the strategic locations of these ports along the River Thames to provide significant benefits through various incentives and streamlined customs processes.
- 8.3.3 Whilst the expansion of the Port of Tilbury through Tilbury 2 has now been completed, the proposals for further port expansion at Tilbury reflecting the tax site designation may come forward through a DCO or a Local Development Order (LDO), however, none of these have yet to come to fruition. Furthermore, the lack of any further planning status provides opportunities for Thurrock in terms of shaping Local Plan strategy to maximise the benefits of the Freeport area for the Borough.

- 8.3.4 The project plans to create up to 5,500 new jobs and contribute approximately £350 million per year to the local economy. It aims to generate significant economic activity by attracting businesses involved in advanced logistics, manufacturing, and energy technologies
- 8.3.5 The full analysis of this project in **Appendix F** sets out a summary of the likely impacts and proposed recommendations for Local Plan policy. These include transport, socio economic and environmental (air quality, noise and flood risk), housing policy and net zero. Key impacts are likely to be an increase in industrial traffic, which along with the cumulative impacts of other developments, such as: the Lower Thames Crossing, the Thames Enterprise Park and Thames Flexible Generation Park, put considerable strain on an already limited road network. Strengthening and adding additional links to the Strategic Road Network is a critical challenge in order to manage traffic flow and mitigate knock on impacts, such as noise and air quality issues for the local community. In addition, the economic and employment growth potential of the Freeport places real significance on Thurrock's future housing strategy to meet this possible demand. A full review of housing policy in connecting with future DCO or LDO plans can mitigate and negative impact on the local housing market and knock-on effects around affordability for local residents.

8.4 Review of Regeneration Schemes

- 8.4.1 There is only one major scheme considered here and the result is set out below in summary.

Purfleet-on-Thames Growth/Regeneration Scheme

- 8.4.2 The project is for the redevelopment of land between the River Thames and the Channel Tunnel rail link. The site covers an area of about 155 acres and is currently occupied by a range of existing industrial uses, derelict land, cottages and a rail line and station. The proposals involve the demolition of all existing buildings and structures on the site, including the Purfleet Station buildings, to make way for a new town centre with improved infrastructure. However, Purfleet Centre Regeneration Ltd (PCRL), a joint venture between Swan Housing Association and Urban Catalyst Ltd and Thurrock Council, announced in March 2024 it was going into voluntary liquidation. This announcement follows prior project updates, which include the withdrawal of Government funding and the subsequent termination of the Housing Infrastructure Fund Grant Determination Agreement. Whilst encouraging efforts were reflected in a letter prepared by PCRL, it did *'not contain sufficient detail for the [Thurrock] Council to realistically conclude that the scheme can be delivered within the terms or timeframe of the current Grant Determination Agreement'*.
- 8.4.3 The site has a significant planning history which is set out in the full analysis in **Appendix F**. Clearly, the proposals for this site have a range of potential impacts requiring mitigation (as set out in **Appendix F**), however, the halt of development progress is likely to significantly impact housing land supply, as the majority of outline consented homes (2,789 homes) are unlikely to meet the latest NPPF requirements for deliverability, except 61 homes.
- 8.4.4 This is likely to also prevent any Housing Trajectories required to underpin the Local Plan to include housing delivery beyond the 61 homes to be included within the first 5 years of the Local Plan until 'clear evidence' can be secured. Due to timeframe restrictions set within the outline application Decision Notice Condition A2 ([Issued 20th December 2019](#)), should the Council enable development to come forward as permitted, a spike in housing completions could be included in housing trajectories in the 3 years following the 20 December 2031, i.e. representing the last opportunity to submit reserved matters applications in respect of development associated with the outline application. The failure to secure high-level partnership arrangements and sufficiently greater certainty on the deliverability of the Purfleet-on-Thames regeneration project, as consented ([17/01668/OUT](#)), is also likely to exasperate the impact on the housing land supply. The resulting risk may lead to the discounting of 2,789 homes from the 'deliverable' housing supply over the plan-period.

- 8.4.5 It is recommended to initiate/continue joint working with Homes England and Central Government to secure new funding sources; or, possibly engage with Government around a form of Development Corporation that includes this project and possibly others, especially in the context of any new Government. Also, there would need to be a full assessment of costs, viability, and deliverability (including reasonable alternative funding partnerships and mechanisms) of the consented application development.

8.5 Review of Other Major Development Sites and Status

- 8.5.1 Following consultation with the previous Local Plan Manager and other Local Plan team members, a further seven major projects were identified for analysis and these results are set out below in summary.

Thames Enterprise Park (TEP)

- 8.5.2 Thames Enterprise Park is a significant redevelopment project located on the site of the former Coryton Oil Refinery in Thurrock, on the Thames Estuary and is part of the Thames Freeport initiative. The project spans 412 acres and aims to transform this brownfield land into a modern hub for manufacturing, logistics, and energy industries, with a strong focus on sustainability and innovation. The development plans for Thames Enterprise Park include industrial units, warehouses, distribution centres, and other facilities to accommodate various sectors such as manufacturing, logistics and distribution.
- 8.5.3 The scheme was originally part of an outline application in 2018, which was revised in February 2021 and the scheme then approved in June 2022.
- 8.5.4 The scheme has the potential to create a number of impacts that will require significant mitigation, such as Transport/traffic, socio economic and environmental (such as: air quality, noise, flood risk). The Thames Enterprise Park presents significant strategic challenges for Thurrock Council. The scale and job creation potential for the scheme places significant pressure on the surrounding areas. A significant increase in traffic volumes particularly heavy goods vehicles will require major improvements and additional capacity to the existing road network. Improved rail infrastructure will also be required in order to maximise the economic benefits of the scheme, while minimising the negative impact on the environment and local community. An integrated transport framework incorporating this and other projects in the south of Thurrock, such as the Thames Freeport is recommended in order to meet the cumulative impacts of these developments. While residential developments are being proposed within the local area there will be a need for a significant increase and the need to develop an integrated housing policy to deliver this sensitively within existing settlements.

Arena Essex

- 8.5.5 This site had over 200 specific responses in the recent IPD public consultation, which are still being analysed, but it is considered important, and the public's views will need to be carefully considered. Whilst there are no live applications for this site, there has been an extensive planning history and there seems to be considerable developer interest.
- 8.5.6 It is a large site and is strategically located immediately to the north of Lakeside adjacent to both the M25 and A13. It has the potential to provide a range of land uses that would be valuable and important for the Council, but there are also significant constraints and potential impacts to consider, overcome and mitigate properly against (there are suggestions for this mitigation provided in Appendix F). In particular, it has some environmental and some flooding constraints and is located within the Green Belt and so any development would need to deal with 'very special circumstances', if it were to come forward outside of the Local Plan process.

- 8.5.7 It may have the potential for employment or mixed use but may have viability issues to consider. It was considered for employment in the recent Regulation 18 IPD and careful consideration must be given to its future use, impacts and mitigation, if it is to be identified as an allocation in the Local Plan going forward.

Corringham

- 8.5.8 This site is located on the north eastern boundary of Stanford-le-Hope and there is a pending application from 2015 (2015), but approved outline planning for some 750 houses and other mixed uses, which has not subsequently been updated. However, the rail operator (Network Rail and c2C) has raised concerns that an additional rail station may not be possible at Corringham without significant investment in rolling stock and there is local opposition to these proposals with a petition of over 1,500 signatures.
- 8.5.9 There are a number of potentially significant impacts identified, which would need to be mitigated relating to traffic and transport (especially on the Five Bells junction), community impacts, proximity to and effects on an SSSI, Green Belt (in addition a petition of over 1,500 signatures is objecting to such Green Belt development) and air quality and noise impacts.
- 8.5.10 The future of this pending outline application is unsure and consequently so are its effects on the Local Plan going forward, especially housing supply. Clearly, further discussions are necessary with the developer and key stakeholder to determine any future for this proposal.

East Tilbury

- 8.5.11 This is a private housing development project for 830 – 1,000 dwellings and other mixed uses and a new railway bridge that was originally proposed in 2016 in an outline planning application, with extensions to its determination period. It now has two scenarios for with and without the LTC project. There have been changes to the proposals in both 2023 and 2024 which have not been determined. The likely future is this application is unknown at this stage, but the private developer is committed.
- 8.5.12 This project has a number of potential impacts (as set out in **Appendix F**) involving transport/traffic, socio economic, Green Belt (which would need to justify very special circumstances) and environmental, all of which would need to be adequately mitigated.
- 8.5.13 The recent Regulation 18 IPD contained potential proposals for this area for a new neighbourhood, noting the lack of existing social infrastructure (and in addition the IPD sets out the likely requirements for such housing development). There are severe access restrictions to East Tilbury due to the existing level crossings and the road and pedestrian bridge proposed as part of the pending planning application ([16/01232/OUT](#)) would provide an alternative to the level crossings if delivered. Within the IPD Consultation Report, the other option for growth in East Tilbury set out was to promote no further development other than the 230 homes approved under application ref. [21/01812/FUL](#) to the north of the railway line.

Grays Shopping Centre

- 8.5.14 There is a long planning history associated with the site with application dating back to the 1970s, the majority of which relate to individual retail units within the centre and advertisement consents for shop frontage alterations. However, this project is submitted by Savills on behalf of the applicant New River Grays SARL in December 2023 and it was validated on 29 February 2024, but it still awaits determination ([23/01446/OUT](#)). It is unclear who will deliver the proposal if approved, but it is for a development involving the demolition of the shopping centre, new mixed uses, up to 860 new dwellings, town centre floorspace, public realm, etc.
- 8.5.15 Its impacts and potential mitigations are set out in **Appendix F**. However, the IPD (Regulation 18) confirms that the Gray's Opportunity Area, which covers the existing town centre, has the

potential to deliver 1,000 to 1,500 new homes with an expectation that the majority would be smaller units. The Shopping centre is not specifically referenced within the IPD.

Linford

- 8.5.16 This is a residential development within Linford that lies to the north west of the railway line close to East Tilbury railway station. The railway line provides a commuter route between Southend Central and London Fenchurch Street. The site has an extant consent ([21/01812/FUL](#)) for 230 affordable homes with associated infrastructure and open space. The application was submitted in October 2021 and approved in June 2023.
- 8.5.17 Development of this site is yet to commence but once delivered it will have a positive impact on the supply of affordable housing in Linford and East Tilbury.
- 8.5.18 The site to the south of the railway line is currently undeveloped arable land. However, the southern area has not submitted for planning consent. The special circumstances that applied to the consenting of the northern parcel's permission ([21/01812/FUL](#)) would also likely apply to the southern parcel, for the provision of any housing or development in the Green Belt. However, unless it becomes allocated, it makes no short-term impact on the available housing land supply.

West Horndon

- 8.5.19 This is a proposal by a private developer for a 'new settlement' of some 2,000 houses and a range of other mixed uses, based only on a Scoping Opinion sought in late-2023. The Council has responded with its Scoping Report and further progress is awaited.
- 8.5.20 Clearly, there are likely to be a number of significant impacts and mitigations to consider – transport and traffic, community impacts, agricultural land impacts, Green Belt impacts (involving justifying very special circumstances), air quality and noise impacts and some flood risk impacts.
- 8.5.21 The recent Regulation 18 IPD identified two potential options for growth with either 2,000 or 5,000 homes, but recognises that much more technical work needs to be undertaken to develop appropriate proposals.

9 Task I: Review Current Local Plan Programme, Business Plan and Finances and Overall Recommendations

9.1 Introduction

9.1.1 Task I, the final Task, was to provide a summary of all recommendations, for the Thurrock Local Plan, for Tasks A – H, as subsequently developed and agreed with the Council. This is set out below in more detail.

‘Task I: Review Latest Local Development Scheme (LDS) and Local Plan Financing and then Develop Recommendations/Proposals for the coming 2-3 years, including Detailed Programme to Regulation 19 and Beyond

- *Sub Task 1 – Review of the current Local Plan Business Plan, previous LDSs / programmes and finances*
- *Sub Task 2 – Summary Report of Tasks A - H – evidence gaps, team/management composition and structure and engagement with major projects*
- *Sub Task 3 – Regulation 19 detailed programme and financing/resourcing*
- *Sub Task 4 – Regulations 22, 24 and 26 broad programme and financing/resourcing*

This will be the ultimate and coordinated recommendations/proposals for the next stage(s) of the Local Plan preparation that will summarise and process the foregoing deliverables, so that Council management and Members can review and endorse the proposals. It is possible that the results of these recommendations and their subsequent endorsement may affect the current LDS programme.

Several of the deliverables set out above are included in order to appreciate past work, current issues, a gap analysis and to ensure an optimum team and process is developed for this subsequent work. It will be necessary to review previous LDSs, the current Local Plan Business Plan and any more detailed programmes and proposals for resources/financing of the Local Plan going forward.

These recommendations/proposals will include the following:

- *Sub Task 1: Review of current Local Plan Business Plan and programme and financing to determine adequacy. This will include recommendations on finances, to help the Council work within defined budgets and identify financial gaps to meet the programme.*
- *Sub Task 2: Summary Report (Tasks C, D, E and G above): to include recommendations for a combined Council officers and Stantec team composition and its structure and management structure, with defined inputs for all staff and management processes, including reviews by Members at various stages.*
- *Recommendations to fill evidence gaps and to enable these gaps to be rectified with immediate work. This must include (as per the work in Task C above) any additional work and broad scope and initial estimated costs for any missing evidence, so that the work to deal with such gaps can be initiated at the earliest opportunity and built into the work to Regulation 19. Also, any work that is about to be commissioned or has recently been commissioned needs to be reviewed for its adequacy against these missing evidence gaps.*

- *Recommendations on technical engagement with major projects and setting out the ideal outcomes for the Local Plan.*
- *Sub Task 3: Detailed programme for development of the Regulation 19 Draft Local Plan (Task H above) for Consultation (including analysis of all responses from the current Regulation 18 consultation) and the ongoing Sustainability Appraisal and detailed costs.*
- *Sub Task 4: Broad programme for subsequent stages of Local Plan preparation (Task H above), involving Regulation 22 (Submission to Secretary of State), 24 (Examination) and 26 (Adoption) and likely broad costs.*

For clarity, Task I – Sub Task 1, is required in order to establish understand the budget and programming expectations previously set, so as to make recommendations for the future. Furthermore, Tasks B and F above are standalone tasks that will be used during the subsequent Regulation 19 work.

These recommendations and costs will be subject to review by Council management and Members and any subsequent comments included within any finally endorsed version.

It should be stressed that the above work set out will be a mixture of some detailed assessments, but mainly broad assessments, so as not to subvert or predetermine the likely outcomes for the detailed Regulation 19 work.

*Deliverable I: this would consist of a **summary report** of key technical recommendations relating to team composition and management, evidence gaps and recommended actions and for future technical engagement with major projects. Also, a **detailed programme to Regulation 19** and a **broad programme for Regulations 22, 24 and 26** and a **summary Business Plan of costs** for each programme would be prepared for consideration.'*

- 9.1.2 This Task I is structured, using the sub tasks above, under the following main headings, as set out below in sub **sections 9.2 – 9.6** below.

9.2 Review of Current Local Plan Business Plan, Current Local Development Scheme and Local Plan Finances

- 9.2.1 The previous Local Plan Manager shared with Stantec the following documents related to the Local Plan Business Plan, which have been reviewed, although it is not clear who the author of each document is, but probably the previous Local Plan Manager. However, no actual and final Business Plan was received and Stantec have not received clarity on the Local Plan Reserve amount or spend to date.

- **Strategic Services – Wider Business Case (undated, but during 2022, prior to the IPD, Reg 19 publication) (9pp)** – this was an examination of restructuring, its functions, how it is involved in Local Plan, timetable for Local Plan and options for publication of Regulation 18 documents.
- **Technical Evidence Future Spend Note, December 2022 (22pp)** – this set out each element (then) of the Local Plan technical evidence and its costs, phasing, commentary and risks of not undertaking the work. There were then some 41 Local Plan evidence base documents covered, plus 6 process documents (all presented with no overall total funding required), with a further 6 documents that were desirable totally £230k (with no time period stated for this amount).
- **Project Summary Report (undated) (19pp)** – again a precursor to the draft Business Plan containing similar information to the documents above.

- **Draft SLT Paper on Local Plan Resources (undated, but likely to be around April/May 2023) (23pp)** – this sets out a background, options and analysis going forward, the usual Council sections on legal, finance and diversity/equality implications and Appendices on the Strategic Services structure and functions, links to the Council’s Improvement and Recovery Plan and Local Plan, funding requirements in summary and detail and the potential Strategic Services restructure.
- **Briefing Paper on Local Plan Resources, August 2023 (21pp)** – this appears to be a precursor to the draft SLT Paper. It set out three options for expenditure (it is assumed over a 4-year period – FY 2022/23 – 2025/26) on the Local Plan – minimum (at £4,098,321), moderate (at £5,011,237) and comprehensive (at £5,767,251), but it is not clear which option was adopted by the Council or if one was adopted. It also contained Appendix 1, which contained an independent assessment by Keith Holland of the draft Business Case and the Local Plan expenditure options. It contained sections on a justification for the Local Plan, Plan preparation requirements, priorities, and conclusions supporting the preparation of a Local Plan. Appendix 2 set out the prioritisation for Local Plan Evidence in a detailed table with committed, necessary, potentially necessary and other categories of evidence documents; and, diagrams for potentially Strategic Services team restructuring. **It was probably the most comprehensive and recent draft of the Business Case.**

9.2.2 **It is clear that a refreshed Local Plan Business Plan is required during 2024 to be considered by the Council, probably towards the end of 2024, which should be approved prior to publishing any revised Local Development Scheme (LDS) (refer to Recommendation R46 below).** The Business Plan should include an update of the programme for all evidence documents required and resource requirements, their costs and progress. But it would be preceded by a section on context about the value of progressing a Local Plan to Regulation 19 and its issues; explanation of the progress plan for completing the evidence studies, recommendations on the future restructuring of the Strategic Planning Services section (renamed from Strategic Services) and the likely funding requirements within the current Local Plan Reserve of completing the work up to the submission of Regulation 22 to Government and beyond to the close of the Examination.

9.3 Summary of Recommendations for Tasks A - H

9.3.1 **Sections 2 – 8** above (with their accompanying Appendices, Figures and Tables) set out the review and summaries and recommendations, as does the Executive Summary, but they are further summarised below for clarity and brevity.

Task A (Review/Comparison of Past and Current Local Plan Proposals)

9.3.2 **Appendix A** provides the full text for this Task A, and it provides a number of summary conclusions – there are some 46 conclusions, also set out in **Section 2** above. These are, as follows:

- a. Issues and Options Stage 1 Report (2016) – 6 conclusions;
- b. Issues and Options Stage 2 Report (2018) – 13 conclusions;
- c. Initial Proposals Document (Regulation 18) (2023) – 19 conclusions;
- d. Design Charter (2023) – 5 conclusions; and,
- e. Other Thurrock Council Strategies (various dates) – 3 conclusions.

9.3.3 **Recommendation R1** – it is strongly recommended that each of and all these 47 conclusions set out in Sections 2.2 – 2.6 above are used and acted upon in the development of the evidence studies, the formulation of more robust growth scenarios

and spatial options, the development of the Preferred Option for growth and the preparation of the Regulation 19 publication submission. In addition, the Local Plan Vision and Strategic Objectives must be revisited and agreed.

Task B (Review of Existing Local Plan Evidence Base Studies)

9.3.4 The specific recommendations for each evidence study are contained in **Sections 3.2 – 3.12** above for each evidence topic area and specifically in **Table 3.2** above and also in the revised Local Plan Programme (**Table 9.1**) below. Also, **Appendix B** provides the full text for this Task B and is summarised in **Section 3**, however, besides those specific recommendations, which are dealt as indicated above, there are also five generic recommendations (**Recommendations R2 – R6**) related to Local Plan evidence documents, as follows:

- a. **Recommendation R2** – the specific recommendations/proposals set out in **Table 3.2** and **Sections 3.2 – 3.12** above should be followed for both **Phase 1** and **2** evidence studies, but monitored and updated on a weekly/monthly basis and managed by the **Local Plan Manager (or equivalent)** and the **Local Plan Project Manager**;
- b. **Recommendation R3** – each evidence base document needs to have a clear **Local Plan officer ‘owner’** – even if it is being produced by another team in the Council. The **Local Plan officer ‘owner’** should manage (or input into) all **Briefs, Project Plans, Methodologies and Draft Reports**;
- c. **Recommendation R4** – **Local Plan Manager (or equivalent)** needs to manage **ALL** **Local Plan** evidence studies, have regular catchups with evidence base ‘owners’, check key documents, such as **Briefs, Project Plans, Methodologies and Draft Reports** and it is vital to build in time to produce a **Brief and Project Plan for ALL** new studies/strategies – for those being undertaken internally and by consultants. **Agree Briefs and Project Plan with Local Plan Manager before work commences**;
- d. **Recommendation R5** – the evidence base studies should be developed in two phases: **Phase 1** – to inform the scenarios for growth and draft Preferred Option for growth and be accompanied in 2024 with **Technical Paper 1**; and, **Phase 2** – evidence that is developed based on the growth scenarios and spatial options to inform the final Preferred Option for growth and be accompanied in early 2025 by **Technical Paper 2**; and,
- e. **Recommendation R6** – build in time in the overall **Local Plan** programme for consultants to submit fee proposals and be instructed, so that there is time for purchase orders and Works Orders to be put in place. **Thurrock Accounts and Legal departments** need to sign-up to undertaking these tasks within a set number of days, so that it can be worked into the overall **Local Plan** programme.

Task C (Review of the Planning Advisory Service (PAS) Report, Latest National Planning Policy Framework (NPPF) and Adopted Local Plans Three Best Practice Examples)

9.3.5 **Appendix C** provides the full text for this Task C and in **Sections 4.2 – 4.4** above.

9.3.6 For the PAS Review, **Appendix C** sets out in **Table 2.1**, after accounting for the recommendations in both the PAS Report and the Planning Service Transformation and Improvement Plan, the PAS recommendations and actions that must be addressed in the production of the new Local Plan.

9.3.7 **Recommendation R7** – this simply supports the four PAS Local Plan related recommendations set out in **Section 4.2** above. Furthermore, a first-class project manager should be recruited to manage the process through to adoption.

- 9.3.8 A timetable within the revised Local Plan Programme is set out below in **Section 9.4** and **Table 9.1** and should be adhered to, this will instil confidence in the process. The Local Plan will require a first-class Project Manager, as the Local Plan is a very complex project to manage effectively. Good communication from the Local Plan team and the Council will be essential and needs to involve elected Members, senior officers, officers of the Council, statutory consultees, the public and any other interested party. This will need strong leadership and ‘champion’ Members and senior management.
- 9.3.9 For the NPPF review, it is dealt with in more detail within **Appendix C** in **Tables 3.1 – 3.3**. **Table 3.4** sets out in considerable detail, with commentary, the detailed requirements of the latest NPPF for the Council to produce the Local Plan.
- 9.3.10 **Recommendation R8 – the Local Plan team should review Appendix C and the NPPF when updating the evidence base or undertaking work on strategic sites, growth scenarios/spatial options or the preferred option for growth, to ensure policy compliance is robust and develop a Local Plan which will be found sound.** In addition, other policy changes are summarised in **Sections 4.3.5 – 4.3.6** above.
- 9.3.11 For the Review of 3 Best Practice Recently Adopted Local Plans, **Appendix C** deals with it in more detail, however, the four recommendations (**Recommendations R9 – R12**) to consider are, as follows:
- Recommendation R9 – it is possible following the General Election on 4 July 2024 and the previous proposals for Local Plan transitional arrangements that the Local Plan system may change, if so, it would have a major impact on the Local Plan Programme that is proposed in Task I. The Council should track and monitor any changes to Local Plan regime at national Government level, identify implications for Local Plan and act accordingly and quickly. In the meantime, work must commence and be completed in 2024 on Technical Paper 1 to support the Regulation 18 IPD;**
 - Recommendation R10 – Thurrock Council needs to seriously reconsider its current Local Plan timetable and is likely to need to formally amend its Local Development Scheme (LDS) and once approved, notify the Secretary of State for DLUHC of that amended timetable, as referred to below in Recommendation R46.**
 - Recommendation R11 – for each of the selected best practice Local Plans, within Tables 4.2, 4.3 and 4.4 in Appendix C, it has been set out which evidence base documents were part of each Local Plan that were then used to gain adoption. These three evidence based document list examples were compiled to produce Table 4.5, which sets out the list of evidence base documents that are considered to be required for the Thurrock Local Plan.**
 - Recommendation R12 – in addition, and again for each of the selected Local Plans, a list of their structure/content for each Local Plan was prepared and from this, recommendations are made about both the most appropriate structure for the Thurrock Local Plan and whether the Initial Proposals Document (IPD) for Regulation 18 structure/content was appropriate. The recommendations for the Local Plan team structure are set out in Sections 4.35 and 4.36 of Appendix C.**

Tasks D and E (Review of Council’s Local Plan and Other Teams Resources, Skills and Management)

- 9.3.12 Although there is no Appendix covering the details of these Tasks, it does cover all the related meeting notes (**Appendix D.1**) and the existing roles and responsibilities of Local Plan team member (**Appendix D.2**). However, there is more detail set out in **Section 5** above, which contains seven Sections, each with summaries and/or recommendations. For those with just summaries (**Sections 5.2, 5.3 and 5.4**), the summaries can be reviewed, including the Flow Diagram that explains the need for two additional Technical Notes to be produced by the Local

Plan team during 2024 (refer to **Section 3.14.4** below and **Figure 5.1**); and, the existing and proposed Organisation Charts (**Figures 5.2 and 5.3**). However, for **Section 5 (Section 5.5.4)**, the four key recommendations relating to Local Plan team involvement and in consultants support (**Recommendations R13 – R16**) are, as follows:

- a. **Recommendation R13** – Local Plan team and technical officers need to work with consultants to produce and agree a Brief and Project Plan for both existing and new Local Plan evidence base studies being produced by consultants. Agree Briefs and Project Plan with Local Plan Manager before any work commences;
- b. **Recommendation R14** – each evidence base document needs to have a clear Local Plan officer ‘owner’, so as to ensure consultants are managed efficiently and outputs are agreed and delivered to programme. The Local Plan officer ‘owner’ should manage (or input into) all Briefs, Project Plans, Methodologies and draft Reports;
- c. **Recommendation R15** – the Local Plan Manager and/or Local Plan Project Manager needs to manage ALL Local Plan evidence studies, have regular progress meetings with evidence base ‘owners’, check key documents, such as Briefs, Project Plans, Methodologies and Draft Reports, as well as attend meetings with consultants, when required; and,
- d. **Recommendation R16** – it is essential to build in time in the overall Local Plan programme for consultants to submit fee proposals and be instructed, so that there is time for purchase orders and Works Orders to be put in place. Thurrock Accounts and Legal departments need to sign-up to undertaking these tasks within a defined/agreed period, so that it can be worked into the overall Local Plan programme.

9.3.13 It is important that Members are involved in the Local Plan process from the start and brought along the Local Plan production journey. The **key recommendations regarding Member involvement in the Local Plan** are set out in **Section 5.6 (Recommendations R17 – R22)** and are summarised below:

- a. **Recommendation R17** – set up the Local Plan Working/Project Group (LPWG) during Summer 2024, with its first meeting in September 2024, using and agreeing ToR broadly in line with the above best practice example;
- b. **Recommendation R18** – ensure a Membership of 12 - 15 elected Members, including a Thames Freeport representative, two public and two landowner/business representatives, which would be quorate with 4 Member attendees and it should meet monthly;
- c. **Recommendation R19** – establish a Work Programme by the second meeting, advised by senior officers, which will involve briefing from officers monthly on progress;
- d. **Recommendation R20** – ensure all Members of this LPWG and other key Cabinet Members attend a soon-to-be established training programme for the coming year;
- e. **Recommendation R21** – appoint a Member ‘champion’ for the Local Plan (possibly the relevant Portfolio Holder) and encourage support from other Members; and,
- f. **Recommendation R22** – this LPWG will issue regular (monthly) updates to both the Planning Committee and full Council of its actions, recommendations and progress on its Work Programme.

- 9.3.14 The recommendations for Local Plan Team Organisational Structure are set out in **Section 5.7 and Figure 5.3**, however, there were four over-riding recommendations (**Recommendations R23 -R26**) guiding the recommendations:
- a. **Recommendation R23 – to ensure there are adequate resources, at the right level, to deliver the Local Plan according to a revised LDS timetable (refer to Table 9.1), but ensuring the evidence studies are completed, suitable scenarios developed, and a Preferred Option is development that are sound for a Regulation 19 publication;**
 - b. **Recommendation R24 – to ensure proper integration of all key technical functions within the Strategic Planning team to produce a sound Local Plan;**
 - c. **Recommendation R25 – to not downgrade existing posts if to do so might cause the current postholder to resign, when that person is a strongly valued member of the team; and,**
 - d. **Recommendation R26 – all Local Plan staff must be integrated more with other teams and build relationships outside the Strategic Services department, to ensure technical liaison is maximised and ensure all relevant aspects are considered within the emerging Local Plan, especially with Health, Housing and Employment, etc. It is vital to bring in other department officers into the relevant evidence studies (i.e. writing Briefs/commissioning consultants; developing methodologies and reviewing assessment results) or getting other departments to undertake evidence base documents) in partnership with the Local Plan team, with there always being a Local Plan officer lead.**
- 9.3.15 Furthermore, as it clear in **Figure 5.3** ‘Recommended Proposed Local Plan and Wider Team Organisation Chart’ the following considerations were covered:
- a. Key changes to existing team structure refer to **Section 5.8.3** above;
 - b. There are 9 vacant posts recommended for recruitment, which will help deliver the Local Plan;
 - c. Recommendations are made without knowledge/reference to current budgets;
 - d. Recommendations have been informed by/discussed with Chief Planning Officer; and,
 - e. The recommendations are restricted to the existing Strategic Services team and exclude Development Management (DM) or Building Services, but it does incorporate Strategic Transport team.
- 9.3.16 It is vital to recognise the shortcomings over recent years with the **senior officers** of the Local Plan and wider team, as the following issues have been experienced:
- a. There have been too many interim managers and recent redundancies;
 - b. Uncertainty caused by the S114 Notice; and,
 - c. Staff retention has not been achieved, largely due to the S114 situation and Recovery Plan, but stability is important for remaining staff.
- 9.3.17 Therefore, going forward it is vital and recommended that senior managers undertake the following key functions: **Recommendation R27 – support the Local Plan and wider team; increase their visibility and support to staff; provide links to other key Council departments with inputs into the Local Plan; assist with training; become more involved in the ‘Duty to Cooperate’ work with neighbouring local authorities.**

- 9.3.18 For **Section 5.8**, ‘Local Plan Team Members: Future Roles and Responsibilities’, the five recommendations (**Recommendations R28 – R32**) underpinning future roles and responsibilities are:
- a. **Recommendation R28** – the existing roles and responsibilities for each team member needs to be simplified and limited to 3 topic/thematic areas only;
 - b. **Recommendation R29** – team members should provide a monthly work programme look ahead and weekly reports of progress to their relevant Manager based on Figure 5.3 and the responsibilities set out in Section 5.8.3;
 - c. **Recommendation R30** – working days and contact details for each Member need to be centrally available and easily accessible;
 - d. **Recommendation R31** – all evidence studies must be preceded by agreed Technical Briefs and a Works Order and then be project managed weekly; and,
 - e. **Recommendation R32** – priorities must be set monthly and rolled forward for each team member’s workload.
- 9.3.19 **Sections 5.8.3 – 5.8.5** sets out the specific recommendations for each current member of the wider Local Plan team and are not repeated here, but are covered by **Recommendation R29** above.

Task F (Summary of Thurrock’s Communities Views Over Time)

- 9.3.20 **Appendix E** sets out in detail the analysis of the various consultations held over the past 7 years on the various stages of the Local Plan and **Section 6** summarises that analysis and recommendations. However, in **Appendix E, Section 6.6.4** the ‘**Key Matters of Significance**’ the views of various stakeholders have been drawn together from respective consultations and attributed to the respective topics, resulting in 78 ‘key matters’ that stakeholders expect the emerging Local Plan for the Council to consider and or address.
- 9.3.21 **Recommendation R33** – these 78 ‘key matters of significant’ must be incorporated into the Local Plan going forward and set out how each has been dealt with.
- 9.3.22 **Recommendation R34** – for the purposes of Local Plan ‘soundness’ and legal compliance, the cooperation with persons identified in Section 33A of the Planning and Compulsory Purchase Act (PCPA), 2004 (as amended) must be demonstrably ‘maximised’ and ‘have been dealt with rather than deferred’. It is important for the Council to work with neighbouring local authorities, as there are cross-boundary issues that do not stop at such boundaries, which need to be explored and planned for. These discussions need to continue now and up to submission of the Local Plan. Moreover, in accordance with current Plan-making Planning Practice Guidance paragraph 31, the duty to cooperate and associated requirements to cooperate ‘cannot be rectified post-submission’ and is therefore particularly key at stages prior to submission.
- 9.3.23 Notwithstanding the above analysis and recommendations, **Recommendation R35** maintains that it is vital that the Local Plan team should be supported by central Council departments (PR/Press, website, marketing/graphics teams/event organising) in the future Regulation 19 consultation, supported by a first-class Local Plan project manager (as set out in Recommendation R7 above – this may also involve the use of additional and appropriate software to assist in dealing with subsequent consultation responses, which should be commissioned later in 2024 or early 2025. Undertaking these tasks is very time consuming and should be done by the appropriate departments, as is set out in **Section 6.6.7** above.

Task G (Review of Integrated Impact Assessment (IIA)/Sustainability Appraisal (SA) for the Local Plan)

- 9.3.24 There is no Appendix relating to these Tasks, but more detail is set out in **Section 7** above, which contains five main sections setting out the analysis and recommendations. The IIA prepared for Regulation 18 Stage meets all regulations, including Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) Regulations, the requirements of the Town & Country Planning (Local Planning) Regulations, 2012 (especially Regulation 18) and the Planning & Compulsory Purchase Act, 2004 Section 19(5). The IIA presents a robust methodology demonstrating compliance with the regulations and provides an adequate assessment appropriate to the requirements at Regulation 18 stage – this is notwithstanding comments in Section 7 concerning the growth scenarios and spatial options not being based on robust and sound evidence.
- 9.3.25 Therefore, the IIA assessment of the scenarios could be incorrect. Although the IIA has a robust methodology, and the assessment was considered to be undertaken correctly (on information provided by the Council) - the Regulation 18 IPD document included scenarios for growth that were not based on evidence. Therefore, if the scenarios for growth change and the Preferred Option for growth is not one of the Regulation 18 scenarios, then the assessment will be incorrect.
- 9.3.26 **Recommendation R36 – it is recommended that further scenarios are developed from evidence and then provided for IIA analysis to ensure the growth scenarios/spatial options and the Preferred Option for growth are tested and are defensible and robust.**
- 9.3.27 The approach to integrate the HIA and EqIA within the overall SA, alongside the requirements for SEA is considered proportionate. The IIA also incorporates and makes reference to previous SA reports published in 2016, 2018 and 2022, regarding the development of the Local Plan to this stage.
- 9.3.28 While it is determined that the IIA meets the above regulations, additional recommendations have been made to strengthen the assessment and ensure robustness as it progresses towards Regulation 19 stage.
- 9.3.29 **Recommendation R37 – these 15 recommendations are summarised in Section 7.5.5 above and these should be adopted when the IIA work is re-commenced in the lead up to the Regulation 19 publication.**

Task H (Current Status and Effects of Major Projects on the Local Plan)

- 9.3.30 **Appendix F** provides a review of the 12 key major projects currently live across the Thurrock Council area and **Section 8** above provides a summary. This includes all future and current Development Consent Orders, Local Development Orders and major Town and Country Planning Act applications. The purpose was to provide a review of each of the 12 projects identified in consultation with the Council, in terms of their proposals, the current consents status, the likely impacts on Thurrock and a review of proposed mitigations recommendations for managing the impact of each development and their cumulative impacts, as well as identifying any strategic Local Plan impacts.
- 9.3.31 Notwithstanding the limitation of this analysis (refer to **Section 8.1.6** above), the overall purpose of this Task H was to provide an overview of the scale and nature of the major development projects within the Council area, while providing a focus on the likely impacts and possible mitigation measures and the more strategic implications for the Local Plan.
- 9.3.32 **Sections 8.2 – 8.5** provide summary information on likely topic-based impacts and the more strategic impacts on the Local Plan.

- 9.3.33 **Recommendation R38** – it is strongly recommended that each project is monitored closely by the Local Plan team and impacts mitigated (wherever possible), but more importantly the effects of each project needs to be accounted for during the preparation of the Regulation 19 publication submission.
- 9.3.34 **Recommendation R39** – the Local Plan team will need to include a Local Plan policy for each strategic site (the full list to be concluded during the course of the Local Plan Regulation 19 production), but it could include these 12 sites and potentially others when the scenarios and Preferred Option for growth are confirmed.
- 9.3.35 **Recommendation R40** – the Local Plan team need to ensure that the information received on each of these 12 sites is fed into each of the Local Plan evidence base studies, as they will each have an impact and create housing and social infrastructure needs, both individually and cumulatively. Furthermore, it is recommended that a single, cumulative Local Impact Report should be considered, even if outside of the formal DCO processes, so the Council can properly understand the extent of these cumulative impacts.

9.4 Regulation 19: Programme and Projected Financing/Resourcing

Key Considerations for Local Plan Programme

- 9.4.1 The Council's Local Plan Programme, based on the latest LDS (dated September 2023), was presented to Stantec in March 2024 by the previous Local Plan Manager. This programme was interrogated and has been updated to reflect the recommendations within this Final Report (and it set out below in **Table 9.1** below), of which the **5 recommendations (Recommendations R40 – R44)**, for the Council's Local Plan Programme are, as follows:
- **Recommendation R41** – introduction of a '**Consolidation Period**' of **approximately 12 months** in order to undertake the Phase 1 evidence studies, complete the Regulation 18 Consultation Report, fill key Local Plan Team staff vacancies and complete two critical Technical Papers (one in the first 12 months and one subsequent to that period);
 - **Recommendation R42** – the need to develop later during late-2024/early 2025 and based on completing key evidence studies set out in Section 3, Table 3.2 and Appendix B, **the development of Local Plan growth scenarios /spatial options** that are more robust and then could be used in the further IDP work and for strategic transport modelling and to inform other evidence studies that require the Preferred Option for growth, such as the Detailed Green Belt Assessment and the Infrastructure Delivery Plan and Local Plan Viability Update;
 - **Recommendation R43** – recognition of the result and outcomes of the **General Election on 4 July 2024** and the '**All-Out**' local elections in **May 2025** and the effect that either could have on Government and Local planning policy and legislation;
 - **Recommendation R44** – **three DCOs would have progressed further**, and they could significantly affect the proposals coming forward in the Local Plan, such as: National Highways LTC decision delayed to 4 October 2024 currently, National Grid's Norwich to Tilbury Connection is likely to have been submitted around mid-2025 and will therefore have more clarity; and the Thurrock Flexible Regeneration Plant approved DCO may have determine its delivery more clearly; and, the **Thames Freeport will have further developed** its planning proposals via a DCO(s) or an LDO, which could significantly affect the Local Plan.

Local Plan Programme

- 9.4.2 The amended detailed Regulation 19 and broad Regulation 22 programme is presented below (in landscape format) as **Table 9.1** and shows the recommendations for the Local Plan programme. This is taken in a point of time and is a working document, which the Chief Planning Officer/Local Plan Project Manager can use and should update on a monthly basis, in discussion with all Local Plan evidence base 'owners' and senior management, through 2024 and 2025. It is, however, also being provided as a separate file to facilitate easier reading of the detail. It will require monitoring and monthly updates by the Local Plan team.
- 9.4.3 The Local Plan Programme (**Table 9.1** below) was updated in early July 2024 to reflect recent understanding related to the Strategic Transport Model progress and future work and recent progress on some evidence studies and following Local Plan Team comments.
- 9.4.4 **Recommendation R45 – this revised Local Plan Programme (Table 9.1) should be approved and updated monthly and used as the basis for updating the LDS in Q4 2024 and this programme must be adhered to by the Local Plan team and other related teams by managing the evidence base 'owners', consultation with other teams and senior officer reviews.**

| Thurrock Revised Local Plan Programme Final Version - 08 July 2024 | | Local Plan Evidence Priorities | | Gantt Chart (Dec-23 to Sep-27) | | | | | | | | | | | | | | | | | |
|---|---|--|--|--------------------------------|-------------------------|----------|--------|------------|------------|-------------|--|--|--|--|--|--|--|--|--|--|--|
| December 2023 (Reg 18) - October 2027 | | Deadlines must not be missed | | | | | | | | | | | | | | | | | | | |
| Project Manager: Gary Staples | | Very important deadlines | | | | | | | | | | | | | | | | | | | |
| Updated: 08 July 2024 | | Deadlines within the programme may become Purple or Red as the Council get closer to deadlines (to be reviewed on monthly basis) | | | | | | | | | | | | | | | | | | | |
| Updated: 08 July 2024 | | Completed | | | | | | | | | | | | | | | | | | | |
| TASK | CURRENT STATUS | NOTES | LINKED PROJECTS | LEAD OFFICER | RESOURCE | PROGRESS | RAG AS | START | END | Gantt Chart | | | | | | | | | | | |
| Water Cycle Study (WCS) - Drafted Study | Not commenced. Draft brief - discussed with AECOM. No Project Plan | 20 weeks. But suggest more time needed, due to some missing and emerging evidence and consultations required. | | Richard Hutter | AECOM | 0% | Red | 01/09/2024 | 31/05/2025 | | | | | | | | | | | | |
| Standon Le Hope Surface Water & Flood Alleviation Studies | Brief agreed and work has commenced | AECOM scope for Surface Water modeling has been reviewed, but no brief. 12 weeks from commission. | | Richard Hutter | AECOM | 0% | Red | 01/07/2024 | 31/09/2024 | | | | | | | | | | | | |
| GREEN BELT, NATURAL ENVIRONMENT, LANDSCAPE, BIODIVERSITY & GREEN SPACE | | | | | | | | | | | | | | | | | | | | | |
| Landscape Character Assessment Part 1 | Not commenced. | Completed 2022 | | Amy Linford | LUC | 100% | Green | 01/03/2025 | 31/08/2025 | | | | | | | | | | | | |
| Landscape Character Assessment Part 2 | Not commenced. | Brief required. 6 months duration. Will need to include historic environment. For all strategic growth proposed. | Growth scenarios, LTC, Freoport | Amy Linford | LUC? | 0% | Yellow | 01/03/2025 | 31/08/2025 | | | | | | | | | | | | |
| ENG Guidance (Green and Blue Infrastructure Strategy (GBIS) Update | In preparation now. Completed 2018, updated 2023 | Problems recurring this project - need Ecologist. Suitable Alternative Natural Green Space (SANG) and many other key additions and requirements, required by Natural England and that update will be required. | | Amy Linford Bina Davis | ECC LUC, Amy Linford | 0% | Yellow | 01/05/2024 | 31/12/2024 | | | | | | | | | | | | |
| Local Nature Recovery Strategy (LNRS) | In preparation, almost complete. | To be published for consultation June 2024. | | Amy Linford | ECC | 0% | Yellow | 01/05/2024 | 30/06/2024 | | | | | | | | | | | | |
| Strategic Green Belt Assessment Stages 1a & 1b | Completed | | | Amy Linford | PPM | 100% | Green | 01/03/2025 | 31/09/2025 | | | | | | | | | | | | |
| Detailed Green Belt Stage 2 Assessment | No commenced, but commissioned. No Project Plan. | Start date - Needs Alternative Options? Preferred Option - check agreed scope with ARUP. Potential further work (extra fee) for viable task. | Growth scenarios, LTC, Freoport | Amy Linford | ARUP | 0% | Red | 01/03/2025 | 31/09/2025 | | | | | | | | | | | | |
| CLIMATE CHANGE & ENERGY | | | | | | | | | | | | | | | | | | | | | |
| Climate Change Study Update | Completed Feb 2023 - Update needed on Brief or Project Plan | Update - targets and methodologies. Also update policy document. Need growth scenarios, LTC and Freoport. 3 months to complete. | Growth scenarios, LTC, Freoport | Bina Davis | ARUP | 0% | Yellow | 01/04/2025 | 30/06/2025 | | | | | | | | | | | | |
| Local Area Energy Plan (LEAP) | Not commenced. No Brief. No Project Plan. | Requires growth scenarios to commence and other key Local Plan evidence documents. 3 months. May not be required as part of Climate Change Strategy | Growth scenarios, LTC, Freoport | Bina Davis | ? | 0% | Yellow | 01/04/2025 | 30/06/2025 | | | | | | | | | | | | |
| Energy Strategy (Review and Update) | Completed June 2022 - Update needed on Brief or Project Plan | Update - targets and methodologies. Also update policy document, LTC and Freoport. 3 months to complete. Need preferred option for growth. | Growth scenarios, LTC, Freoport | Bina Davis | ARUP | 0% | Red | 01/04/2025 | 30/06/2025 | | | | | | | | | | | | |
| BUILT ENVIRONMENT & DESIGN | | | | | | | | | | | | | | | | | | | | | |
| Design Charter | Completed as part of IPD. | Completed - almost completed. | | Amy Linford | | 95% | Green | 01/12/2023 | 31/08/2024 | | | | | | | | | | | | |
| Design Audit, then Boroughwide Design Codes / Guide | Commenced. No Brief. Project Plan available internally. | Place and Design Team to lead. Will follow on from Design Charter. Dami and focus on short term contracts - risk to programme. | | Amy Linford | | 5% | Red | 01/06/2024 | 31/12/2025 | | | | | | | | | | | | |
| Cultural Strategy - development of cultural Infrastructure Mapping and Potential Projects List | Not yet started | Vital role in place development | | Amy Linford | | 0% | Yellow | 01/08/2024 | 31/12/2024 | | | | | | | | | | | | |
| Assessment of Settings - Thurrock SAMS | Completed Dec 2023 | | | Amy Linford | | 100% | Green | 01/09/2024 | 28/02/2025 | | | | | | | | | | | | |
| Comprehensive Historic Assessment | Not commenced. No Brief. No Project Plan. | ECC Places Services undertook a Report on Thurrock SAMS in 2019. Rural Settlement Assessment and Assessment of Settings - Thurrock SAMS need to finalise this document. 6 months max/over. | | Amy Linford | ECC Place Services | 100% | Green | 01/09/2024 | 28/02/2025 | | | | | | | | | | | | |
| INFRASTRUCTURE, DELIVER & VIABILITY | | | | | | | | | | | | | | | | | | | | | |
| Infrastructure Delivery Plan (Baseline - Update) | Draft received, but now requires updating, which is included within the current IDP commission | To be done alongside the IDP. | IDP | ibc | ARUP | 0% | Yellow | 01/06/2025 | 31/12/2025 | | | | | | | | | | | | |
| Infrastructure Delivery Plan | Fee proposal agreed, work started. Stage 1: High level infra needs based on early growth scenarios. Stage 2: Full IDP or more detailed Local Plan growth scenarios established. March 2023 current version. | Stage 1 completion December 2024 Stage 2 completion Autumn 2025 (subject to MAA, transport modelling/assessments and preferred option for growth). 4-months | Preferred option for growth | ibc | ARUP | 0% | Yellow | 01/09/2024 | 31/10/2025 | | | | | | | | | | | | |
| Whole Local Plan Viability - Regulation 19 Update | Update not commenced. No Brief. No Project Plan. | There is an inter-relationship with IDP (Stage 2), as infrastructure costs required. Also, CL, if pursued. Need preferred option for growth. 3 months | IDP, Transport modelling, Strategic cost | ibc | EDM Planning | 0% | Red | 01/04/2025 | 31/10/2025 | | | | | | | | | | | | |
| MINERALS & WASTE | | | | | | | | | | | | | | | | | | | | | |
| Minerals Safeguarding Area Study | Completed - needs updating. Not commenced. No Brief. No Project Plan. | 3 months subject to procurement. | | Richard Hutter | ? | 0% | Red | 01/09/2024 | 31/12/2024 | | | | | | | | | | | | |
| Minerals and Waste Local Plan? | Not commenced. No Brief. No Project Plan. | Separate Local Plan - unknown start date | | ibc | ? | 0% | Yellow | ? | ? | | | | | | | | | | | | |
| Monitoring | | | | | | | | | | | | | | | | | | | | | |
| Develop Monitoring Framework for Local Plan | | | | In-house | | 0% | Yellow | 01/09/2024 | 31/12/2024 | | | | | | | | | | | | |
| Authority Annual Monitoring Report (AMR) 2023/2024 and 2024/2025 | | Housing, employment and retail. Site visits and information gathering to inform the 100/25 AMR. | | In-house | | 0% | Yellow | 15/01/2025 | 30/04/2027 | | | | | | | | | | | | |
| 3-Year Housing Land Supply (HLS) - ongoing annual updates | | To be undertaken annually and included in the AMR and then updated and published thereafter if required as a standalone document. | | In-house | | 0% | Yellow | 15/01/2025 | 31/05/2026 | | | | | | | | | | | | |
| Other Requirements - Self Build & Custom Build Register, Brownfield Land Register and Housing Delivery Test Action Plan | Underway | Often urgent request from BLMC and developers | | In-house | | 25% | Red | 01/07/2024 | 31/09/2024 | | | | | | | | | | | | |
| Local Plan Document Tasks | | | | | | | | | | | | | | | | | | | | | |
| Regulation 19 document | | | | | | | | | | | | | | | | | | | | | |
| Forward | Not commenced | | | | | 0% | Yellow | 01/06/2025 | 31/01/2026 | | | | | | | | | | | | |
| Introduction and Contact | Not commenced | | | | | 0% | Yellow | 01/06/2025 | 31/01/2026 | | | | | | | | | | | | |
| What is this about? | Not commenced | | | | | 0% | Yellow | 01/06/2025 | 31/01/2026 | | | | | | | | | | | | |
| How it fits with Corporate Plan? | Not commenced | | | | | 0% | Yellow | 01/06/2025 | 31/01/2026 | | | | | | | | | | | | |
| How to use this document | Not commenced | | | | | 0% | Yellow | 01/06/2025 | 31/01/2026 | | | | | | | | | | | | |
| Key Issues, Characteristics and Challenges | | | | | | | | | | | | | | | | | | | | | |
| General overview | Not commenced | | | | | 0% | Yellow | 01/06/2025 | 31/01/2026 | | | | | | | | | | | | |
| A prosperous place | Not commenced | Housing, skills & employment, infra, infrastructure and town/local centres | | | | 0% | Yellow | 01/06/2025 | 31/01/2026 | | | | | | | | | | | | |
| A well connected place | Not commenced | Transport | | | | 0% | Yellow | 01/06/2025 | 31/01/2026 | | | | | | | | | | | | |
| A green Borough | Not commenced | Environment, Green Belt | | | | 0% | Yellow | 01/06/2025 | 31/01/2026 | | | | | | | | | | | | |
| A healthy community | Not commenced | Flood | | | | 0% | Yellow | 01/06/2025 | 31/01/2026 | | | | | | | | | | | | |
| Environmental capacity and development issues | Not commenced | | | | | 0% | Yellow | 01/06/2025 | 31/01/2026 | | | | | | | | | | | | |
| Vision, Objectives and Strategy for New Development | | | | | | | | | | | | | | | | | | | | | |
| Vision | Not commenced | | | | | 0% | Yellow | 01/06/2025 | 31/01/2026 | | | | | | | | | | | | |
| Objectives | Not commenced | | | | | 0% | Yellow | 01/06/2025 | 31/01/2026 | | | | | | | | | | | | |
| Strategy for new development | Not commenced | | | | | 0% | Yellow | 01/06/2025 | 31/01/2026 | | | | | | | | | | | | |
| Strategic / Core Policies | | | | | | | | | | | | | | | | | | | | | |
| Introduction | Not commenced | | | | | 0% | Yellow | 01/06/2025 | 31/01/2026 | | | | | | | | | | | | |
| Policy for each strategic topic | Not commenced | | | | | 0% | Yellow | 01/06/2025 | 31/01/2026 | | | | | | | | | | | | |
| Development Management Policies | | | | | | | | | | | | | | | | | | | | | |
| Introduction | Not commenced | | | | | 0% | Yellow | 01/06/2025 | 31/01/2026 | | | | | | | | | | | | |
| Relevant DM policies | Not commenced | | | | | 0% | Yellow | 01/06/2025 | 31/01/2026 | | | | | | | | | | | | |
| Site Allocations | | | | | | | | | | | | | | | | | | | | | |
| Introduction | Not commenced | | | | | 0% | Yellow | 01/06/2025 | 31/01/2026 | | | | | | | | | | | | |
| Each site that is allocated | Not commenced | | | | | 0% | Yellow | 01/06/2025 | 31/01/2026 | | | | | | | | | | | | |
| Appendices, Monitoring and Implementation Framework | | | | | | | | | | | | | | | | | | | | | |

9.4.5 **Amendments to Current LDS** – regarding the existing LDS, which was published and dated September 2023. **Recommendation R46** – it is strongly recommended to review and update the Local Plan Business Plan and then update the LDS in Q4 of 2024 and to notify Government of any such changes. This is because of three key reasons:

- There is a considerable number of evidence studies not completed or not started and this would add considerable risk to producing robust Regulation 19 documents, as is clear from **Section 3** above;
- Government policy has recently been updated in a number of areas (as set out in **Section 4.3** above) and further updates are in process after the General Election; and,
- It is vital to update Government (informally and formally) on any changes to the Council's Local Plan programme as soon as practicable, as is evidenced by Stoke on Trent City Council's recent activities and updated LDS (as set out in **Sections 4.4.6 – 4.4.11** above).

9.4.6 The recommended amendments to the Council's LDS are set out below in the same format as the latest September 2023 LDS.

| Stage | Target Date |
|--|----------------------|
| Scoping | COMPLETED |
| Issues and Options (Stage 1) | COMPLETED |
| Issues and Options (Stage 2) | COMPLETED |
| Local Plan: Initial Proposals Consultation (Regulation 18) | COMPLETED |
| Local Plan: Publication Draft Consultation (Regulation 19) | January-March 2026 |
| Submission to Secretary of State for examination in public (Regulation 22) | July-September 2026 |
| Commencement of Examination hearings | Possibly Early 2027 |
| Inspector's Report expected | Possibly Autumn 2027 |
| Adoption of the Local Plan by Council | Possibly Early 2028 |

9.4.7 The above Local Plan Programme is set out as a recommended 'best informed at this time', based on current information and understanding as of June 2024 and may be subject to change during the rest of 2024. The programme should be monitored closely by the Local Plan Project Manager.

9.4.8 Notwithstanding the above recommendations, it is essential that senior management and Members support and approve the revised Local Plan Programme and action the recommendation within this Report, prior to any publication of a revised LDS – otherwise the certainty of achieving such a revised programme will be compromised.

- 9.4.9 **Recommendation R47 – for senior management and Members to support and approve the revised Local Plan Programme, prior to any publication of a revised LDS.**

Risks to Local Plan Programme

- 9.4.10 There are clearly a number of potential risks to achieving this amended Regulation 19 programme, noting the main changes above and the detailed programme referred to below.
- 9.4.11 **Recommendation R48 – the key risks are set out below and should be incorporated into the existing Corporate Risk Register or amend those risks relating to the Local Plan accordingly.**
- Completion of the key evidence studies are not achieved on time (highlighted in purple, red and amber primarily in **Table 3.2**), due to lack of funding or project management;
 - Strategic Transport modelling completion of key parts of the model by early 2025 to enable testing of the scenarios and preferred option for the Local Plan. Risk of transport modelling work not being project managed properly to provide right information for the Local Plan at the right time;
 - Local Plan Project Manager being in post in Q3-Q4 2024 (permanent or interim);
 - Additional resources being obtained within the Strategic Planning Service and Local Plan Team;
 - Members not supporting the Local Plan proposals throughout the Local Plan productions, over next couple of years;
 - Risk of the outcomes from the **General Election on 4 July 2024** and the **‘All-Out’ local elections in May 2025** and the effect that either could have on Government and Local planning policy and legislation;
 - Change in Local Plan-regime brought in by National Government (currently programmed for Autumn 2024); and,
 - The risk that the two DCOs (LTC and Norwich to Tilbury) are approved with proposals that either have a significant effect on Thurrock or inadequate mitigation that affect the Local Plan deleteriously. Additional risk, that these DCOs are approved and planned for in the Local Plan, but then pulled by Government later. In addition, the future development of the Thames Freeport could have significant effects depending on the proposals that come forward.

Local Plan Funding

- 9.4.12 It is anticipated that additional funding will be required to complete the Local Plan through to adoption, however, the current total sum within the Local Plan Reserve (which it understood to be around £5m) and current spend (unknown), but **it is anticipated that a further £1 - £2m may be required up to Local Plan adoption, based on the additional staff resources needed, increased costs of the evidence studies and any delay costs that are likely over the coming 12 months.** Although such clarity or any request for additional funding should be delayed until later in 2024 or early 2025, when there will be greater clarity on several key matters.
- 9.4.13 **Recommendation R49 – that the Local Plan Reserve is closely monitored on a quarterly basis to understand remaining funding and, as appropriate, update and increase the Local Plan Reserve in Q1 of 2025 for £1 - £2m to ensure adequate funding through to Local Plan adoption. A more detailed analysis of current spend against Local Plan Reserve budget is required and an estimate of additional funding required (with full justification) until Local Plan adoption.**

9.4.14 It should be noted that this additional funding is a broad estimate, based on experience and spending to date (as set out in the draft Business Plan – refer to **Section 9.2** above).

9.5 Broad Programme for Regulation 22

9.5.1 This is set out within the programme in **Table 9.1**, referred to above and is necessarily broad. This is because there are many unknowns remaining in achieving the proposed Regulation 19 programme, its consultation and subsequent Regulation 22 submission. Although covered in the above recommendations, for clarity the top 5 of these unknowns are, as follows:

- Completion of all key evidence studies this year or by Spring – Autumn next year;
- Completion of robust scenarios/growth or spatial options, based on completion of the key evidence studies;
- Completion of the Strategic Transport model to a sufficient level to undertake scenario analysis and then Preferred Option analysis;
- Completion of a significant part of the current IDP Update work in order to determine infrastructure gaps and potential funding sources; and,
- Potential changes to Government planning policy (especially any amendments to the Local Plan process) and potential changes to the local political approach to the Local Plan proposals.

9.5.2 All these unknowns are inter-dependent on one another, thereby compounding the difficulty of defining a definitive programme.

9.6 Conclusions

9.6.1 Whilst the results and recommendations within the PAS Report are supported and included in all the recommendations (particularly R1, R2, R3 and R4) it was a 3-day analysis. The analysis and recommendations set out in this Report were the result of a 3-month in-depth study and analysis, with the close support and involvement of the wider Local Plan team, the Chief Planning Officer and senior management – therefore the results and recommendations are considered robust and worthy of being approved and adopted by the Council in ongoing work on the Regulation 19 publication submission.

9.6.2 **Recommendation R50 – that senior management and Members endorse and approve and use all recommendations in this Final Report as Council policy to be adopted in subsequent Local Plan work going forward.**

9.6.3 The analysis, results and recommendations provide the wider Local Plan team with sufficient information, support and encouragement to proceed to the Regulation 19 stage with the following 12 key aspects:

- a. Provides more confidence and certainty for the wider Local Plan team;
- b. A better understanding of the trajectory, consistency and progress of the Local Plan over the past 8 years;
- c. More knowledge of and improved integration with other Council strategies and departments;
- d. A robust, up-to-date and relevant evidence base;
- e. Greater project management of all aspects of the Local Plan;
- f. Improved knowledge and monitoring of national planning policy and of policy changes;
- g. The availability and use of best practice examples of recently and successfully adopted Local Plans;

- h. Better and more organised resources to work on the Local Plan;
- i. A better understanding of communities and stakeholder views that that can be properly utilised in the next stage of the Local Plan, including developing the Local Plan Vision and Strategic Objectives;
- j. An improved and robust IIA process going forward into Regulation 19;
- k. A knowledge and understanding of key major projects and their potential effects that can be utilised in the Regulation 19 formulation, including Local Plan policies; and,
- l. Finally, the knowledge that the results will be robust for subsequent Local Plan stages and that the Local Plan programme is realistic and backed by sufficient resources, if these recommendations are subsequently agreed and followed.

Appendix A Task A: Review/Comparison of Past and Current Local Plan Proposals

Appendix B Task B: Local Plan Evidence Base Reviews

The Sub Appendices below are taken from Section 3.1 and Table 3.1

- **B1: Housing, including Traveller Sites**
- **B.2: Employment and Economy and Infrastructure, Delivery and Viability**
- **B.3: Transport**
 - Annex 1: Evidence Flowchart
 - Annexes 2 – 6: Meetings Notes
- **B.4: Retail, Centres, Rural Settlement/Area Studies (SADFs) and Built Environment and Design (Design Charter and Codes)**
- **B.5: Green Belt, Sports, Playing Pitches and Open Space and Historic Assets and Scheduled Monuments, Minerals and Waste, Lakeside Vision and Placemaker**
- **B.6: Flooding and Water**
- **B.7: Natural Environment, Landscape, Biodiversity and Green Space**
- **B.8: Climate Change and Energy**

Appendix C Task C: Review of PAS Report and Recommendations, Latest NPPF and for Best Practice Examples of Recently Adopted Local Plans

Appendix D Tasks D and E: Local Plan Team, Management, Gaps and Recommendations

- **D.1: Meeting Notes**
- **D.2: Existing Roles and Responsibilities (March 2024)**

Appendix E Task F: Summary of Community Views on Local Plan

Appendix F Task H: Review of Major Projects in Thurrock

- **F.1: Thurrock Flexible Regeneration Plant (TFRP) DCO**
- **F.2: National Highways: Lower Thames Crossing (LTC) DCO**
- **F.3: National Grid: The Great Grid Upgrade – Norwich to Tilbury DCO**
- **F.4: Thames Freeport and its LDO**
- **F.5: Purfleet-on-Thames Growth/Regeneration Project**
- **F.6: Thames Enterprise Park (TEP)**
- **F.7: Arena Essex**
- **F.8: Corringham**
- **F.9: East Tilbury**
- **F.10: Grays Shopping Centre**
- **F.11: Linford**
- **F.12: West Horndon**