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Dear Sir/Madam

## **Southend-on-Sea Local Development Framework – Development Management DPD Issues and Options and Habitats Regulations Assessment Screening Report**

Thank you for your letter of 27 September 2010 consulting Natural England about the above documents.

### **A) Development Management DPD – Issues and Options**

Natural England's detailed comments on the various issues are as follows:

#### **Section 3: Development Management Policy Context**

##### Southend-on-Sea LDF Core Strategy – Strategic Objectives

Natural England supports the set of 19 Strategic Objectives which, together, provide a balanced framework for development within the Borough.

#### **Section 4: Design and Townscape**

##### Issue DM1 – Design of Developments

Natural England supports the council's suggested option.

##### Issue DM2 – Tall Buildings

Natural England supports the council's suggested option.

##### Issue DM3 – Intensification of Existing Residential Sites and Areas

Natural England supports the council's suggested option.

##### Issue DM4 Low Carbon Development and Efficient Use of Resources

Natural England supports the council's suggested option.

##### Issue DM5 – Southend-on-Sea's Historic Environment

Natural England supports the council's suggested option.

##### Issue DM6 – Alterations and Additions to Existing Buildings

Natural England is generally supportive of the council's suggested option. However the requirement for all such developments to "make a positive contribution to the character..." may be unduly restrictive and, particularly in the case of small extensions, a neutral impact might be considered acceptable.

## **Section 5: The Seafront**

### Issue DM7 – Flood Risk and Water Management

Natural England is generally supportive of the council's suggested option. However, in view of this Issue's location within the 'Seafront' Section of the document and consequent focus upon tidal flood risk, it is not immediately apparent how fluvial flood risk elsewhere in the Borough would be addressed. Climate change may well result in increased frequency of extreme rainfall events affecting the half-dozen or so north-south streams within the Borough; whilst sea level rise is likely to increase the proportion of time that their discharge into the sea is prevented by 'tide locking'.

### Issue DM8 – Seafront Public Realm and Open Space

Natural England supports the council's suggested option. Individual proposals may well require assessment under The Conservation of Habitats and Species Regulations 2010.

### Issue DM9 – Seafront Character Zones

Natural England supports the council's suggested option. Individual proposals may well require assessment under The Conservation of Habitats and Species Regulations 2010.

### Issue DM10 – Water Recreation

Natural England is generally supportive of the council's approach; although we are concerned that the suggested provision of new and improved facilities for water recreation may result in adverse effect upon the interest features of the Benfleet and Southend Marshes SSSI, SPA and Ramsar site. Individual proposals are likely to require assessment under The Conservation of Habitats and Species Regulations 2010.

## **Section 6: Residential Accommodation**

### Issue DM11 – Dwelling Mix

(Natural England does not wish to comment on this issue.)

### Issue DM12 – Affordable Housing Tenure

(Natural England does not wish to comment on this issue.)

### Issue DM13 – Retention of Residential House Types

Natural England supports the council's suggested option.

### Issue DM14 – Residential Space Standards

(Natural England does not wish to comment on this issue.)

### Issue DM15 – Student Accommodation Space Requirements

(Natural England does not wish to comment on this issue.)

### Issue DM16 – Houses in Multiple Occupation

(Natural England does not wish to comment on this issue.)

### Issue DM17 – Specialist Residential Accommodation

(Natural England does not wish to comment on this issue.)

## **Section 7: Economic Development**

### Issue DM18 – Network of Centres

Natural England supports the council's suggested option.

### Issue DM19 – Shop Frontage Management

(Natural England does not wish to comment on this issue.)

Issue DM20 – Employment Sectors

Natural England supports the council's suggested option.

Issue DM21 – Industrial Estates and Employment Areas

Natural England supports the council's suggested option.

Issue DM22 – Employment Uses

Natural England supports the council's suggested option.

Issue DM23 – Visitor Accommodation

Natural England supports the council's suggested option.

**Section 8: Environmental Management**

Issue DM24 – Contaminated Land

Natural England is generally supportive of the council's suggested option. Acceptable contaminant thresholds for open space usage are generally higher than the corresponding thresholds for residential usage. Therefore, in cases where contaminants are present but at relatively low levels, consideration should be given to the potential for the area to be utilised for green infrastructure uses. Such an approach could potentially also help to address the issue of existing under-provision of open space within densely developed neighbourhoods.

Issue DM25 – Land Instability

Natural England supports the council's suggested option.

**Section 9: Transport and Accessibility**

Issue DM26 – Sustainable Transport Management

Natural England supports the council's suggested option.

Issue DM27 – Vehicle Parking Standards

(Natural England does not wish to comment on this issue.)

**B) Habitats Regulations Assessment - Screening Report**

Natural England considers that the HRA Screening Report provides an adequate assessment of this stage in the evolution of the Development Management DPD. Subject to the inclusion of appropriate wording within the Policies arising from Issues DM7, DM9 and DM10, we would concur that an Appropriate Assessment should not be necessary.

If you have any queries relating to the content of this letter, please contact me at the above address.

Yours faithfully

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