

## **Chelmsford City Council Response to Southend-on-Sea Issues and Options Local Plan**

Chelmsford City Council (CCC) welcomes the opportunity to comment on the Southend-on-Sea Borough Council (SBC) Issues and Options Local Plan.

It is noted that the purpose of this consultation is to identify the issues the new local plan should cover, options for addressing these issues, to highlight key evidence base documents and to decide what policies are needed.

CCC has the following comments on the consultation document:

### Duty to Co-operate

CCC notes SBC involvement in the South Essex 2050 Vision and welcomes the commitment to prepare a Joint Strategic Plan (JSP) between Castle Point, Basildon, Brentwood, Rochford, Southend-on-Sea, Thurrock and Essex County Council. Although it is recognised that work on the Joint Strategic Plan is at an early stage and is not expected to be adopted until 2020.

It is acknowledged that the Local Plan has been prepared in the context of ongoing joint working across South Essex in order to address strategic cross boundary matters and in the context of the Southend 2050 Vision.

### Vision

It is clear that sustainability is at the heart of the Local Plan and the strengths and opportunities together with the challenges for the Local Plan are clearly set out.

### Spatial Strategy and Housing

CCC notes that the identified local housing and economic needs equates to 18,000 – 24,000 new homes using the standardised methodology and 10,000 – 12,000 new jobs over a 20-year plan period. SBC have identified three potential options for how to meet the identified need.

It is noted that the preparation work for the Southend Housing and Employment Land Availability Assessment (HELAA) indicates that Southend will not be able to continue to meet all of its housing need within its existing urban area or on land at the edge of the existing built up area of Southend, therefore SBC recognise the requirement to look at other possible solutions to meet the need. This may include the promotion of larger strategic scale development (garden communities). It is noted that given Southend administrative boundary, this work would likely involve working with neighbouring authorities of Castle Point and Rochford, and as such this is work that the South Essex Joint Plan would consider.

It is noted that the South East Essex Strategic Growth Locations Assessment has identified one area around Southend (north of Fossetts Farm, Garon Park and Bournes Green Chase, incorporating land within both Southend Borough and Rochford District) that has the potential to accommodate strategic scale development and therefore will be investigated further.

The options set out in the Issues and Options document include:

Option 1 - all development within existing built up areas of Southend. This could deliver 5,200 – 9,100 homes, based on delivering all available housing sites in the urban area and continuing current levels of unexcepted sites coming forward. It would also rely on further evidence work such as an Urban Living Study to be undertaken to look at potential to increase housing densities across Southend.

Option 2 involves most development to be located within existing built up area, focused in specific locations such as the Town Centre, Airport and main passenger transport corridors, with some development on the urban edges on green field and Green Belt land in Southend. This option could deliver 10,000 – 13,800 homes (including around 4,750 on greenfield/ green belt land) but would also rely on the Urban Living Study to be undertaken for the town centre and main passenger transport corridors.

Option 3 is based on Option 2 together with further joint working with neighbouring authorities to develop a comprehensive new settlement on Green Belt land potentially across Borough boundaries (strategic scale development). This option has the potential to deliver all development needs through development within the existing built up area plus the provision of a new settlement located on Green Belt land potentially able to provide the remaining development needs in full. This option would require partnership working with other adjoining local authorities to deliver such a strategic scale development.

Whilst each option has its own advantages and disadvantages which would need to be looked at in considerable detail, CCC is concerned that options 1 and 2 may not meet the identified housing need. The Protocol for dealing with unmet housing needs requests has been agreed between Essex Local Planning Authorities through the Essex Planning Officers' Association resulting in an effective joint mechanism being put in place, the continued joint working with neighbouring authorities is encouraged to aid delivery of strategic allocations to meet housing needs in full within the Borough or Housing Market Area.

It is also crucial that any site allocations are supported by the appropriate infrastructure. An Infrastructure Delivery Plan should be produced to support the Local Plan.

Furthermore, both CCC and SBC have been involved in the joint Gypsy, Traveller & Traveller Showpeople Accommodation Assessment (GTAA) with other relevant Essex Local Planning Authorities. The assessment undertaken across Essex found that there are no additional pitches needed for gypsy and traveller sites or additional plots required for travelling showpeople in Southend.

On transit sites, CCC acknowledges the GTAA's recommendations to engage, through the Duty to Cooperate, with other Essex authorities in the future to review the need for transit sites. Further work on this is also being undertaken by Essex County Council to consider the need for these sites across Essex as a whole.

## Employment

CCC notes that the employment need for the borough is between 10,000 – 12,000 new jobs over the 20-year plan period. The South Essex Economic Development Needs Assessment (EDNA 2017) identifies 'growth clusters' (located around the Town Centre, London Southend Airport and northern Southend corridor) as having the potential to achieve future growth in Southend. The EDNA suggests that there is a need for up to 39,000sq metres/4 hectares of additional office space in Southend over the next 20 years.

To conclude, CCC is supportive of the approach taken by Southend-on-Sea to review the Local Plan. CCC will continue to work collaboratively with SBC through the Duty to Co-operate as the Local Plan progresses.