

# **Southend Local Plan Issues and Options**

Land West of Wakering Road, Thorpe Bay, Southend

Prepared on behalf of Templewick Partnership

April 2019

Site Name:	Land West of Wakering Road, Thorpe Bay, Southend
Client Name:	Templewick Partnership
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## **APPENDICES**

Appendix A – Site Location Plan

#### 1.0 Introduction

- 1.1 These representations are made in response to consultation on Southend-on-Sea Borough Council's (the Council) Local Plan Issues and Options (SLPIO), and on behalf of the Templewick Partnership.
- 1.2 The Templewick Partnership controls land the west of Wakering Road, Thorpe Bay, Southend ('the Site') (near SS1 3RB, north of Bournes Green Roundabout) which was submitted for consideration for residential allocation through the Council's Call for Sites process in May 2017. For completeness a copy of the Site Location Plan is provided again as Appendix A to this representation.
- 1.3 The SLPIO represents the first iteration of the new Local Plan for Southend-on-Sea Borough, and includes potential options for meeting the Borough's housing and economic needs. This iteration of the new Local Plan does not set out specific potential sites for growth, but rather strategic options from which specific sites will be considered as the plan progresses.
- 1.4 The Site is discussed later within this representation, but in overview it measures 5.96 ha; is currently agricultural land adjoining the settlement of Southend; is not subject to any constraints to its residential development, with the exception of current planning policy; and is considered a suitable, available and achievable site to help meet development needs.
- 1.5 The Site was put forward for consideration for both residential development and a retirement village. The Site remains available for residential development and / or specialist housing to help meet the Borough's ageing population.
- 1.6 This representation considers the housing need within the Borough, the three spatial strategy options within the SLPIO, and the relevance to the Site.

## 2.0 Housing Requirement

#### **Overall housing need**

- 2.1 Since the preparation of the SLPIO, an updated National Planning Policy Framework (NPPF) and accompanying Planning Practice Guidance (PPG) have been published. These updates clarify that in calculating housing requirement using the Standard Method, 2014-based subnational household projections should be used.
- 2.2 Using the 2014-based subnational household projections, considering annual average household growth between 2019 and 2029, and having regard to the latest (2018) ratio of median house price to median gross annual workplace-based earnings for the Borough published by the ONS (10.27), the Borough's annual housing requirement is 1,177 dwellings. Over 20 years this equates to a need for 23,540 new homes.
- 2.3 The total need across South Essex, using the Standard Method, is over 4,000 dwellings per annum.
- 2.4 The NPPF (paragraph 11) requires strategic policies such as those that the new Southend Local Plan will provide to seek to meet the housing requirement as a minimum.
- 2.5 The NPPF (paragraph 22) states strategic policies should look ahead over a minimum 15-year period from adoption, and should seek to anticipate and respond to long-term requirements and opportunities. In preparing this new Local Plan, we would urge the Council to be mindful of likely timescales to adoption and to ensure the Local Plan will address, as a minimum, development requirements 15 years from this point.
- 2.6 In addition, the Borough's growth is heavily constrained by land allocated in the most recent Development Plan as Green Belt. The implications for the spatial strategy are discussed later in this response, but in terms of the overall quantum of housing the new Local Plan should seek to provide, we urge the Council to be mindful that the NPPF states amended Green Belt boundaries should be capable of enduring beyond the plan period. As such, in considering the strategy for meeting development needs, the Council should seek to ensure development needs beyond the end of the plan period will not

necessitate a review to the Green Belt. As such, we suggest there would be merit in the new Local Plan seeking to accommodate in the region of 20 years of development needs.

- 2.7 The Local Plan must seek to meet housing needs in full in the first instance, in order to comply with the NPPF, within the Borough and through joint working with neighbouring authorities. As per the NPPF, the standard method provides the *minimum* number of homes to be provided for. As such, it will be necessary for the new Local Plan to consider whether the minimum figure should be exceeded. In relation to this issue, it should be recognised that increasing the provision of new homes to beyond the minimum requirement will not only give rise to further social and economic benefits; but will also help ensure the Local Plan has sufficiently flexibility to be able to respond to rapid change, and to help minimise chances the Green Belt will need to be reviewed before the end of the plan period, both requirements of the NPPF (paragraphs 11 and 136, respectively).
- 2.8 In addition to seeking to meet the overall housing requirement, and the spatial approach to this, it is important to give due regard to temporal aspects of delivery. Specifically, it will be necessary to ensure the Local Plan enables housing needs are met at all points in the plan period the NPPF (paragraph 73) requires Local Authorities to be able to demonstrate a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement on an ongoing basis.

## Accommodation needs of older people

- 2.9 In addition to the total housing requirement, the PPG<sup>1</sup> notes that the Standard Method for assessing housing need does not break down the overall figure into different types of housing, and that the need for particular sizes, types and tenures of homes as well as the housing needs of particular groups should be considered separately.
- 2.10 The PPG goes on to state that, when producing policies to address the needs of specific groups, strategic policies will need to consider how the needs of individual groups can be addressed within the overall need established.

<sup>&</sup>lt;sup>1</sup> Paragraph: 017 Reference ID: 2a-017-20190220

- 2.11 As such, it will be important for the housing needs of specific groups to be considered through the preparation of the new Local Plan.
- 2.12 It will also be necessary to seek to address such need: the NPPF (paragraph 50) requires Local Planning Authorities to plan for a mix of housing having regard to the needs of different groups, including older people. The PPG<sup>2</sup> describes the need to provide housing for older people as critical, noting the increase in this part of the population. It stresses that older people will have diverse needs, ranging from active people approaching retirement to the very frail elderly.
- 2.13 As the Local Plan progresses, it will be necessary to ensure that effective policies are in place to ensure the aforementioned issues are addressed and this particular requirement of national policy to be met. This will include ensuring sufficient sites are allocated which are available to meet specialist accommodation requirements.

<sup>&</sup>lt;sup>2</sup> Paragraph: 017 Reference ID: 2a-017-20190220

## 3.0 Spatial Strategy: Option 1

- 3.1 Option 1 suggests all development be provided within the existing residential area of Southend.
- 3.2 The SLPIO acknowledges this will only deliver a limited number of homes of between 5,200 and 9,100 significantly short of meeting needs in full. As such, this approach cannot result in a sound Local Plan. Rather, it would risk significant negative social and economic impacts associated with a failure to provide sufficient homes to meet needs.
- 3.3 The SLPIO identifies a number of additional concerns with Option 1:
  - Risks of overdevelopment affecting the amenities and character of established residential areas;
  - Limited opportunities/high costs of providing new services and facilities such as schools, health and community facilities;
  - Potential loss of employment land to housing development;
  - Potential detrimental impact on skyline and key views of tall buildings in more sensitive locations;
  - Potential oversupply of small flats.
- 3.4 We agree with the above. Having regard to these points raised, regardless of the fundamental concern that Option 1 would fail to meet needs in full, Option 1 alone could not facilitate a sound Local Plan.
- 3.5 Further to the identified concern that Option 1 would result in a potential oversupply of small flats, it should be recognised that between 2002 and 2018, 73% of gross completions in the Borough were flats, offering limited choice for residents, particularly those requiring family accommodation. The PPG<sup>3</sup> emphasises the need to ensure the type of accommodation required is considered, in addition to simply the quantum. The Local Plan should look to meet the needs of all, including those requiring family accommodation, and look to redress the recent imbalance in provision weighted towards flatted accommodation. Option 1 would not, in our view, achieve this.

<sup>&</sup>lt;sup>3</sup> PPG, paragraph: 017 Reference ID: 2a-017-20190220

3.6 It is important that the Local Plan promotes development which is deliverable – the new Local Plan will be required to be effective in order to be found sound (NPPF, paragraph 35). In relation to Option 1 and the replacement of existing employment sites with residential development, in addition to concerns as to the social and economic impact of the loss of employment land, it is unclear if existing employment uses will be prepared to vacate such sites to enable their residential redevelopment.

## 4.0 Spatial Strategy: Option 2

- 4.1 Option 2 is to focus development within the existing built up area, in specific locations such as the town centre, airport and main passenger corridors; with some development on the urban edges on greenfield and Green Belt land in Southend.
- 4.2 As with Option 1, a major concern with reliance on this option would be its inability to meet development needs in full, as the SLPIO recognises.
- 4.3 However, it is recognised that this approach has benefits. One of which not identified in the SLPIO is the potential for this approach to help deliver homes in the early years of the plan period. Large scale, major strategic development often has significant lead-in times, given the coordination of multiple landowners, infrastructure providers and authorities required to deliver such schemes<sup>4</sup>. Smaller scale edge of settlement development can be on land under single ownership or ownership with a limited number of developers, and with elements which can be delivered without requiring major infrastructure provision.
- 4.4 The timing of delivery is an important aspect of the Local Plan, given the need for Local Planning Authorities to ensure a five-year housing land supply throughout the plan period (NPPF, paragraph 73); and mindful of the current housing shortage within the Borough, exemplified by the Housing Delivery Test 2018 measurements, which indicated only 49% Borough's needs have been met over the last three years.
- 4.5 The Site (land west of Wakering Road) would help deliver a spatial strategy which followed Option 2 of the SLPIO.

## The Site (land west of Wakering Road, Thorpe Bay)

- 4.6 The Site measures 5.96 ha and is greenfield, agricultural land.
- 4.7 The Site is allocated as Green Belt in the current adopted Development Plan, but immediately adjoins the existing settlement which sits outside the Green Belt.

<sup>&</sup>lt;sup>4</sup> Nathaniel Lichfields (2016) Start to Finish; MHCLG (2018) Independent Review of Built Out

- 4.8 Existing development lies to the west, east and south of the Site (residential, leisure centre / school, and residential, respectively). The Site is also enclosed by roads to the west, east and south.
- 4.9 The Site is relatively flat and featureless, with the exception of landscaping along its boundaries.
- 4.10 The primary constraint to the Site's development is its current allocation as Green Belt. In terms of potential physical constraints, the Site is entirely located within Flood Zone 1 – land least at risk of flooding from tidal or fluvial sources. It is not subject to any ecological designations, and given its agricultural use, is considered unlikely to be of significant ecological value. The Site is not within or in proximity to a Conservation Area, nor does it contain any Listed Buildings or Scheduled Monuments. The Site is not in proximity to the only Air Quality Management Area within the Borough (the Bell Junction).
- 4.11 The Site is located in a highly sustainable location which would form a logical extension to the existing settlement. The Site is not subject to any designations which suggest its development would result in environmental harm its allocation for development will reduce the need to utilise other, potentially more environmentally sensitive sites, to meet development needs. The Site is in close proximity to a range of services and facilities, ensuring accessibility for future residents through alternatives to the private car, with resultant social and environmental benefits.
- 4.12 Development of the Site would result in economic benefits. The development of the site for housing will have resultant social benefits associated with ensuring sufficient homes are available for the local community. Development of additional homes results in intrinsic local and wider economic benefits. Employment relating directly and indirectly to the construction of new housing will have positive economic and social impacts from the outset. In addition, new residents will provide additional local expenditure, helping to maintain the vitality and viability of the local area.
- 4.13 Vehicular access to the Site is very much achievable without requiring additional third party land. Potential options include at Wakering Road and / or Royal Artillery Way.
- 4.14 The Site is suitable and achievable for residential development, and its aforementioned characteristics also make it suitable for development for specialist accommodation to

meet the accommodation needs of older people. The Site is available for general residential development, specialist housing for older people, or a combination of both. As the PPG recognises (as discussed earlier within this representation) the accommodation needs of older persons are extremely broad, and we would welcome further discussions with the Council as to the form of accommodation which is required and may be considered suitable at this location.

#### The Site and Green Belt

- 4.15 The primary constraint to the Site's development is its current allocation as Green Belt.
- 4.16 The NPPF recognises that Green Belt boundaries can be altered, setting out this should be through a Local Plan and only where exceptional circumstances are fully evidenced and justified (paragraph 136).
- 4.17 Whilst 'exceptional circumstances' are not defined, there is case law which provides a framework for the consideration of the issue. In particular, the judgment in Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) suggests (paragraph 51) that the following matters are relevant in the consideration of whether exceptional circumstances exist:
  - The scale of the objectively assessed need;
  - Constraints on supply/availability of land with the potential to accommodate sustainable development;
  - Difficulties in achieving sustainable development without impinging on the Green Belt;
  - The nature and extent of the harm to the Green Belt; and
  - The extent to which impacts on the purposes of the Green Belt may be mitigated as far as practicable.
- 4.18 In respect of the first point, the Borough clearly has a substantial unmet housing need, as discussed earlier within this representation.
- 4.19 In terms of potential to meet needs without impinging on the current Green Belt, the SLPIO recognises the limited capacity within the existing built up area to meet

development needs, and notes that the Council needs to consider releasing land from the Green Belt in order to meet the identified requirements. The potential to deliver sustainable development without amendments to the Green Belt boundary is clearly limited.

- 4.20 In respect of the fourth and fifth points, this will be dependent on specific sites their characteristics, proposed development, and potential to mitigate impacts.
- 4.21 In relation to the Site (land west of Wakering Road), its contribution to the purposes of the Green Belt is severely limited. The Site is enclosed on three sides (east, west and south) by existing development and roads. The Site's character is influenced by these existing urban components. It cannot be said that development of the Site would project into the open countryside, and would not engender concerns regarding unrestricted urban sprawl. The boundary to the north is formed by a hedgerow, and the Site's development could be accompanied by additional landscaping to further mitigate any concerns here.
- 4.22 In terms of the preventing neighbouring towns merging into one another, the Site forms a logical extension to Southend and the nearest other settlement is a considerable distance away and very much functionally separate from the Site. Development of the Site would not give rise to concerns in respect of coalescence of settlements.
- 4.23 In respect of assisting in safeguarding the countryside from encroachment, again the surrounding development is very much relevant. Development of the Site would not project into open, undeveloped countryside. Development would clearly be associated with the existing settlement it adjoins, and would not represent a significant encroachment into the countryside.
- 4.24 The absence of development on the Site does not assist in preserving the setting and special character of an historic town. Again, the Site's relationship with the adjoining settlement and the surrounding existing development are relevant, and it is clear that the Site's development would not undermine the setting or character of Southend and would not impact on heritage assets.
- 4.25 Development of the Site would not assist in urban regeneration, or the recycling of derelict or other urban land, but this is the case for any greenfield, Green Belt site and is

not a determinant factor in considering adjustments to the Green Belt boundary through this Local Plan.

### Overcoming concerns identified in respect of Option 2

- 4.26 The SLPIO notes that a key concern with Option 2 is that it will not meet housing needs in full.
- 4.27 Option 2 and strategic-scale growth are potential approaches which are not mutually exclusive, as the SLPIO recognises. If Option 2 were to be pursued, we suggest it would need to be in conjunction with large strategic growth to the north of the Borough (Option 3) in order to ensure that development needs are met in full. Such an approach has the potential to realise the respective benefits of such strategies to meeting development needs, and negate the disadvantages associated with each. This is discussed further in our response to Option 3.

## 5.0 Spatial Strategy: Option 3

#### **Cross-boundary working**

- 5.1 Option 3 combines Option 2 with working with neighbouring authorities to develop a comprehensive new settlement across Borough boundaries (strategic scale development).
- 5.2 Under the Duty to Cooperate, Local Authorities are required to work with one another to address strategic issues. This point is reiterated at paragraphs 24 to 27 of the NPPF, and at paragraph 35 of the NPPF it is confirmed that effective joint-working is a prerequisite of a sound Local Plan
- 5.3 Neighbouring authorities are required to consider the unmet needs of their neighbours (NPPF paragraphs 11, 35, and 60). Joint working is considered particularly important in the case of Southend-on-Sea Borough, given that the administrative boundary is drawn relatively tightly around the existing settlement, with limited opportunities for growth without expanding into another administrative area.
- 5.4 In 2018 the Association of South Essex Local Authorities (ASELA) was established, comprising Basildon Borough Council, Brentwood Borough Council, Castle Point Borough Council, Rochford District Council, Southend-on-Sea Borough Council, and Thurrock Borough Council.
- 5.5 A 2018 Memorandum of Understanding (MoU) for Strategic Planning in South Essex, signed by the members of ASELA, commits the member authorities to working together to develop and achieve a vision for South Essex up to 2050 the 'South Essex 2050 Ambition' (SE2050).
- 5.6 ASELA has agreed that a 'no border' approach to address development needs is an appropriate strategy, in recognition of the fact that administrative boundaries do not necessarily reflect the sub-region's social and physical characteristics.
- 5.7 The SE2050 suggests that there is potential for additional growth on top of the minimum required to meet housing needs in South Essex, subject to the right conditions being in

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place to support such growth. Such additional growth give rise to the potential for significant, positive social and economic impacts for the sub-region.

- 5.8 The potential benefits of strategic scale growth are recognised by ASELA, noting that development of new garden communities could offer a strategic solution to growth, as well as significantly enhance housing opportunities and community facilities for local people, supporting new commercial and employment hubs, and creating centres of business excellence within the sectors of industrial opportunity.
- 5.9 Further to this, the SLPIO itself identifies a range of benefits that large scale strategic growth could deliver, as follows:
  - Potential for significant improvements to existing highway accessibility provided as part of new settlement;
  - Major new services and facilities provided such as schools, health and community facilities;
  - A greater range of homes provided, such as family, affordable, older people housing;
  - Retention of character and amenities of established residential areas;
  - Protection of key employment areas and opportunity to provide additional employment within new settlement;
  - New settlement providing new parks and access to greenspace;
  - Existing parks, public gardens, woodland and coastline protected.
- 5.10 We agree that strategic growth has the potential to deliver the above benefits. Whilst a number are attributed specifically to a new settlement, we wish to stress that these benefits would also apply to large scale strategic growth connected with the existing settlement. Indeed, the benefits would be greater if the large scale growth were to be integrated with the existing settlement. For example, a strategic scale development, well-connected to the existing town, providing new parks and access to greenspace for new and existing residents would be of greater benefit to the existing community than a new settlement detached from Southend providing such parks and greenspaces, but not accessible to existing communities.

- 5.11 Having regard to the above, we consider that the Local Plan should support strategic scale growth which is integrated with the existing settlement. Not only would this enable existing residents to realise the potential benefits of such development, but it would reduce the impact of development on the Green Belt: a new settlement detached from Southend, set within the Green Belt, would create an island of development surrounded by relatively small parcels / strips of Green Belt land, the function of which to meeting the purposes of the Green Belt would be very limited. Such an approach would be of far greater harm to the Green Belt than a development of the same size but adjoining the existing settlement, which would enable the preservation of substantial and meaningful areas of Green Belt.
- 5.12 Further benefits of a strategic scale residential development include its potential to deliver a significant number of affordable homes. Such a benefit would be highly unlikely to be realised through a strategy for growth which relied on small-scale, ad-hoc development within the existing settlement.
- 5.13 A large scale development through either an urban extension or new settlement will provide the critical mass of housing to incorporate new schools, both primary and secondary. The SLPIO identifies concerns in respect of growth and infrastructure capacity, and the ability for large scale development to provide such infrastructure represents a significant benefit of this approach, particularly when compared with Option 1. Such infrastructure provision also has the potential to be of benefit to residents of existing development, provided the strategic growth is well-related to the existing settlement.
- 5.14 The SLPIO identifies the disadvantages to Option 3 as being loss of greenfield land and Green Belt; and loss of some agricultural land.
- 5.15 In respect of the loss of greenfield land, whilst the NPPF (paragraph 117) states that in seeking to accommodate development needs Local Plans should seek to make as much use as possible of previously developed land while achieving appropriate densities (NPPF paragraph 122) and securing well designed, attractive places (NPPF Chapter 12), the NPPF does not preclude the allocation of greenfield land on this basis. Clearly it would not be feasible to accommodate the Borough's development needs through redevelopment of previously developed land within the existing settlement without promoting development which would be fundamentally out of keeping with the existing

character of Southend and risk substantial harm to the character and appearance of existing residential areas.

5.16 Development of a strategic scale gives rise to the potential to open up land for public and enhance public access to the countryside. This represents a further benefit and helps mitigate the potential harm in respect of loss of greenfield, particularly within the context of the NPPF (paragraph 118) encouraging improvements to public access to the countryside.

#### Land North of Southend and strategic scale development

- 5.17 In January 2019, the South East Essex Strategic Growth Locations Assessment (SEESGLA) was published. This identified six broad locations comprising mainly undeveloped land beyond the urban extent of Southend as warranting assessment as to their potential to accommodate strategic scale development.
- 5.18 One was found to be potentially suitable following this exercise: North of Fossetts Farm, Garon Park and Bournes Green Chase ('Sector D').
- 5.19 The SEESGLA states the Sector D area comprises predominantly open fields with some sporadic housing, located to the south east of Rochford, and north of the built up area of Southend from Warners Bridge to Star Lane.
- 5.20 The SEESGLA describes this land as comprising low lying estuary arable land, mostly good quality agricultural land, south of the River Roach Estuary, with scattered farmsteads and former farm cottages, a number of which are listed. It notes the only Conservation Area is the churchyard of Shopland Church; and recognises that part of the estuary is protected by the River Roach and Crouch Estuaries Special Protection Area, and a large proportion of the sector is designated as Coastal Protection Belt in the Rochford Core Strategy and Allocations Plan (currently under review).
- 5.21 We note the constraints identified above are focused on the northern element of this parcel, located furthest from Southend and within Rochford District, as illustrated on Map 4 of the SEESGLA.

- 5.22 Table 6 of the SEESGLA considers Sector D's suitability to accommodate strategic scale development against a number of criteria. In respect of environment, this again notes that the constraints are focused within the northern extremes of the parcel, with the majority of the sector relatively unconstrained. Similarly, in respect of landscape and topography, historic environment, and geo-environmental considerations, the most significant constraints tend to be focused in the northern part of the sector, with the majority of the parcel relatively unconstrained. The SEESGLA notes that infrastructure enhancements will be required, as would be expected for any strategic scale development.
- 5.23 The land identified under Sector D includes the Site (land west of Wakering Road). The Site is located at the southern boundary of Sector D, adjoin the existing settlement of Southend. As such, it is not subject to the concerns that have been identified in respect of Sector D, focussed in the north of the parcel.
- 5.24 We note that whilst some of the land within Sector D that lies within Rochford District is subject to constraints to development, not all of such land is. We are aware that sites within Rochford District within Sector D have been put forward for allocation through Rochford District Council's plan-making process; and we would encourage Southend-on-Sea Borough Council to work closely with Rochford District Council to ensure a comprehensively planned strategic development within this area, through which potential benefits can be maximised and potential negative impacts mitigated.
- 5.25 It is considered that it will be important to prioritise for development those areas within Sector D which have a strong relationship to the existing settlement of Southend. Not only will such an approach ensure that the benefits of such strategic development will be felt by existing residents as well as future ones, but this will also minimise the extent to which development is being directed into the open countryside, minimising harm to the Green Belt.
- 5.26 One of the potential disadvantages with a strategy of relying on strategic scale development is the long lead-in times and resultant difficulty in delivering homes in the early years of the plan period. This issue is particular pertinent in the case of Southend-on-Sea Borough, given the acute existing housing need and current lack of supply to address this. However, this issue can be addressed by identifying smaller sites within strategic growth locations which are able to come forward earlier and independently of

the wider, strategic scale development, but which integrate into such strategic development in the future. This approach would enable the benefits of Options 2 and 3 to be realised, whilst overcoming concerns associated with these – development needs can be met in full and accompanied by substantial new infrastructure, but at the same time development can come forward to meet needs in the early years of the plan period.

5.27 As land adjoining the existing settlement and well located in relation to existing services and facilities, and land located within a wider area identified as having potential to accommodate strategic scale growth, the Site is ideally placed to deliver homes within the early part of the plan period, and integrate into the strategic scale development in the future.

#### **Conclusion on Option 3**

- 5.28 Strategic scale development has the potential to deliver a range of substantial benefits, and have a number of significant positive social, economic and environmental impacts. We consider that such an approach will need to form part of the Council's strategy for growth, if development needs are to be met in full and sustainably.
- 5.29 The key disadvantage associated with Option 3 (the time taken to deliver homes through strategic development) can be negated through allocating smaller sites in additional to the strategic growth to help meet needs in the short term. By allocating such smaller sites that are capable of integrating into the wider strategic development at a later date, the strategy for growth can realise the benefits associated with Options 2 and 3, and at the same time would avoid the disadvantages associated with these.
- 5.30 Emerging evidence supports strategic scale development to the north of Southend-on-Sea Borough and into Rochford District.
- 5.31 The Site (land west of Wakering Road) would help deliver a spatial strategy which aligned with Option 3 of the SLPIO. The Site (land west of Wakering Road) is located within an area identified as having the potential to accommodate strategic growth. Separately, it is also a sustainable and deliverable site for development in its own right. As such, it is extremely well placed to come forward for development in the early years of the plan period (residential and / or special accommodation for older people) and subsequently integrate into a larger strategic development.

#### 6.0 Overview

- 6.1 The Borough has an acute housing need, and the Local Plan must seek to address this. Failure to do so would not only be contrary to national policy, but would risk significant social and economic harm to the Borough.
- 6.2 It is important for the Local Plan to consider the housing needs of all of the population including older people and ensure the needs of all are met.
- 6.3 Options 1 and 2 of the SLPIO would not enable development needs to be met in full. Option 3 and strategic scale development does have potential to meet needs in full, in a sustainable manner and with substantial benefits. Such benefits, particularly to existing residents, would be maximised through strategic scale development which is well-related to the existing settlement.
- 6.4 The key disadvantage associated with a strategy which relies on strategic scale development is the difficult with current housing needs to be met in the short term through such an approach. This issue can be addressed through a Local Plan which not only supports strategic scale growth, but also allocates a range of smaller sites capable of delivering homes early in the plan period. If such sites are also capable of subsequently integrating into proposed strategic scale growth, the benefits of such an approach are further enhanced.
- 6.5 The Site (land west of Wakering Road) is a sustainable and suitable site for development, which is available and achievable for either housing, specialist accommodation for older people, or a combination of both. It is ideally located to be able to deliver homes in the early years of the plan period, helping to meet current needs, and to form part of a larger strategic development in the future.
- 6.6 As the Local Plan progress, we would welcome further discussions with the Council regarding this Site and its potential to form part of a sustainable strategy for managing the Borough's growth.