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Southend-on-Sea Borough Council,
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02 April 2019

Ref. 11/403

Dear Sir/ Madam,

REPRESENTATIONS TO THE SOUTHEND-ON-SEA NEW LOCAL PLAN ISSUES AND OPTIONS CONSULTATION IN RESPECT OF FOSSETTS FARM, SOUTHEND

Iceni Projects Ltd has been instructed by C&S Associates Ltd, to prepare representations to Southend-on-Sea Borough Council's ('the Council') Regulation 18 New Local Plan consultation. C&S Associates Ltd wish to outline the development potential of land at Fossetts Farm, Southend ('the Site') and the contribution that the land could make to meeting Southend's future development needs over the next twenty years. Landsbury also wish to make clear that the Site is available for development now and that the current policy context provided under the adopted Development Plan, allows for its early delivery.

These representations provide an overview of the site characteristics; highlight the strategic matters that should inform the new Local Plan; and then responds to Issues and Options Consultation Document.

a. Site Context

The 5.5ha Site is located on the eastern side of Fossetts Way, to the north of Southend Urban Area, wholly within Southend-on-Sea Borough. The Site is greenfield and currently in agricultural use. There are no physical constraints restricting development. There are no statutory or non-statutory landscape designations covering the Site and it is not designated Green Belt. The Site is located within Flood Zone 1 and therefore has a low probability of flooding. The Site has two existing vehicular access points onto Fossetts Way.

The northern boundary of the Site adjoins the Rochford District administrative boundary. There is a B&Q retail store operating on the site to the immediate south. The land to the west is subject to a Development Brief for Southend University Hospital and the Southend Football Stadium and Training Facility site is further west. The land to the east and north is allocated as Green Belt.

In terms of public transport provision, the Site is approximately 1.3 miles from Prittlewell train station which is served by Greater Anglia and is on the line between Southend Victoria and London Liverpool Street. Fossetts Way is also served by a regular bus service providing connectivity to Southend Town Centre.

A site location plan is provided at **Appendix 1**.

b. Planning Policy Context

Although these representations are principally focused on the content of the emerging Southend Local Plan we wish to make clear that the Site at Fossetts Farm is suitable for delivery under the current Development Plan for the Borough and hence is not reliant on the emerging Local Plan coming forward in order to facilitate development.

The Site is located to the north of Southend on a greenfield site that is outside of the Green Belt. It is located in an area that is currently the focus of new development, with proposals for Southend University Hospital and the Southend Football Stadium and Training Facility coming forward.

As such it provides a logical extension to the existing urban area of Southend and ensures that the more immediate housing needs of the Borough can be accommodated on land outside of the Green Belt but within Southend's administrative boundary.

Equally, we note that the Site and its availability to accommodate new homes, is consistent with the emerging growth options for Southend set out in the New Local Plan (Issues & Options) document. As such we provide commentary on this below.

c. Southend-on-Sea New Local Plan Issues and Options

This Section provides a response to the questions posed within the Issues and Options Consultation Document, taking the strategic matters considered above into account.

Section 1: How should Southend develop in the future in seeking to deliver 18,000 – 24,000 new homes and 10,000 – 12,000 new jobs?

The Council should look to weigh-up its priorities including development need, environmental impacts and strategic growth options when assessing potential spatial strategies. Some of these key determinants are discussed below.

Development Need

Paragraph 11 in the NPPF states that plans should positively seek opportunities to meet the development needs of an area; and that strategic policies in plans should, **as a minimum**¹, provide for objectively assessed needs for housing, as well as any needs that cannot be met within neighbouring areas where this can be achieved consistent with the application of policies in the Framework that protect areas or assets of particular importance; and it is sustainable to do so assessed against the policies in the Framework as a whole. The NPPF as a whole places particular emphasis on meeting housing needs.

On this premise, the Council should seek to plan for a minimum of 23,560 dwellings over the Local Plan period of 20 years.

The Issues and Options Consultation Document presents three alternative options for future development. It is evident that the Local Plan is in its early stages of preparation and the full detail of these development options is yet to emerge.

Notwithstanding, it is evident that the Site can make an important contribute to meeting the future development needs of the Borough and the minimum housing need identified above.

¹ Emphasis added.

How best do you think we should provide for our future housing needs?

It is evident that without the development of greenfield/ Green Belt land, the Council will fall significantly short of meeting their local housing needs, with in the region of 60% of needs going unmet. The Green Belt boundaries should be reviewed and altered through the Local Plan process to accommodate housing growth. However, these changes will need to be fully evidenced and justified and exceptional circumstances will need to be demonstrated.

It is logical and best practice to first consider the development of land that falls beyond the Green Belt in order to reduce the level of Green Belt land required to meet development needs. Land availability is limited in Southend due to tight administrative boundaries and there may be a need for some of Southend's development needs to be met beyond the Borough by the adjoining local authorities. The land at Fossetts Farm lies within the administrative boundary of Southend and furthermore, it is not designated Metropolitan Green Belt. As such, the allocation of the Site would limit the level of Green Belt release required and ensure that development opportunities within the administrative area to meet local need are maximised.

The Site is located in an area that is currently the focus of new development, with proposals for Southend University Hospital and the Southend Football Stadium and Training Facility coming forward. The Site provides a logical extension to the existing urban area of Southend but equally, it would appropriately form part of wider strategic growth proposals depending on the outcome of further work to be undertaken as part of the Local Plan evidence base.

The NPPF outlines that to be considered deliverable, sites for housing should be available now, offer a suitable location for development now and be achievable with a realistic prospect that housing will be delivered on sites within five years.

The land at Fossetts Farm was considered as part of the Council's Housing and Employment Land Availability Assessment (HELAA) (2018) – site reference HEA105. The Site was categorised as currently unsuitable but to be tested through the Local Plan preparation.

In terms of availability, it is inferred that the Site is currently unavailable as it is designated as employment land and the release of the Site for housing development would be dependent on a separate Employment Land Review. It is not apparent where the assumption relating to the employment land allocation originates. The Development Management DPD Proposals Map (2015), which forms part of the adopted local development framework does not show that the Site falls within any employment area designation. In fact, it clearly demonstrates that the Site is not subject to any specific policy designations. An extract of the Proposal Map is provided at **Appendix 2**. The Site is being promoted by the freehold landowners through the New Local Plan preparation process and is available for development in the short-term. These considerations mean that it is an unconstrained Site that is suitable for development and the assessment set out in the HEELA is contended.

Notwithstanding, the assessment that the Site is considered to be suitable for housing development in principle because of the characteristics of the Site and there are no known physical or environmental constraints is supported. The Site adjoins the build-up area of Southend and is located within an emerging area for future development, with proposals for the Southend University Hospital and the Southend Football Stadium and Training Facility located to the west of the Site. As mentioned above there are also no policy constraints preventing development.

In terms of achievability, the Site location adjacent to the Southend urban area, means that it will be inherently attractive to the market. The greenfield nature of the Site, with access available to Fossetts Way indicates that there are no physical constraints that would inhibit development and would result in abnormal development costs that would impact on the viability of the proposal. The Site is being promoted by the freehold landowner and as such there are no barriers to achievability.

The HEELA assessment suggests that if half of the Site were to come forward allowing for other uses on the remainder, that it would yield 170 dwellings. A capacity assessment undertaken on behalf of the landowners, indicates that the Site could accommodate up to 450 residential dwellings. This would make a meaningful contribution to meeting Southend's housing needs within the Local Plan period.

Although the focus of these representations has been on housing, the characteristics of the Site lends it to being appropriate for a range of land uses, such as retail, which could help to meet needs over the Local Plan timeframe. As set out above, the Site is available now and could reasonably be brought forward now and considered on its merits. Any future policy should retain flexibility in this respect.

d. Conclusion

In conclusion, the land at Fossetts Farm is an unconstrained site, located adjacent to the Southend Urban Area in an area that is a focus for development. The Site is not designated as Metropolitan Green Belt and is not subject to any other policy constraints restricting development. It is available, suitable and achievable for residential development or a range of other uses in the short-term and therefore is capable of making a meaningful contribution to Southend's future development needs.

It is requested that the new Local Plan seeks to meet local housing needs of 23,560 dwellings over the next 20 years. The Council will need to work with other local authorities in South Essex to ensure that this is achieved and that the wider regional 2050 Ambition is realised.

Fossetts Farm could accommodate up to 450 dwellings and the principle of residential development is accepted in the Council's evidence base.

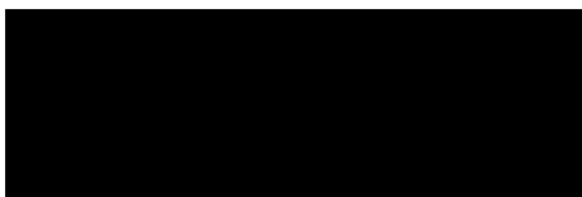
The Site could come forward under the current Development Plan prior to the emerging New Local Plan being adopted. Hence, the Site could play an important part of shorter term development needs of the Borough.

As part of the emerging Local Plan however, the allocation of the Site would limit the level of Green Belt release required and ensure that development opportunities within the administrative area to meet local need are maximised. It is therefore requested that the Site is allocated for development as part of the Local Plan process.

Although the focus of these representations has been on housing, the characteristics of the Site lends it to being appropriate for other land uses, such as retail, should additional land be required for this purpose to meet local needs over the Local Plan period. Any future policy should retain flexibility in this respect.

We would be grateful for confirmation that these representations have been successfully received and would like to confirm that we would like to be involved in the future stages of the Local Plan process going forward.

Yours sincerely,

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Luke Challenger
ASSOCIATE

Enc.