

Director of Enterprise, Tourism and the Environment
Southend-on-Sea Borough Council
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28 April 2011

DC/07/087/1
BY POST AND EMAIL

Dear Sir/Madam,

SOUTHEND ON SEA BOROUGH COUNCIL
LOCAL DEVELOPMENT FRAMEWORK CONSULTATION – PROPOSED SUBMISSION
DEVELOPMENT MANAGEMENT DPD

Iceni Projects Ltd (Iceni) has been instructed by Stratland Management Ltd (a Cordea Savills company) on behalf of Colonnade Land LLP (CLLLP) to submit representations to the Proposed Submission Development Management DPD (DMDPD) March 2011.

CLLLP represents the interests of landowners to the north of Southend.

a) Background and Overview

CLLLP has sought to engage in the development of the Local Development Framework (LDF) for Southend and has submitted a number of representations to this end.

CLLLP considers Southend to be one of the most important locations in the Thames Gateway for improving both the local and regional economy. This is based on the potential that exists for Southend to function as a regional city for Essex Thames Gateway and the potential of Southend Airport to develop into a successful regional airport for the sub-region and an economic pole in its own right.

The advent of localism and the changes to the planning system being brought into place by the Government provide an opportunity for the Council to drastically enhance the quality of life of its residents, enhance the individuality and unique character of Southend and provides the optimum framework to deliver on the long-standing objectives of the Council to deliver improvements to the strategic transport infrastructure network. This is the first time in a planning generation that the Council will be truly able to take control of its own planning destiny without being driven by targets and should be wholly embraced.

CLLLP recognises that the potential of Southend cannot be fully realised without extensive new highway and public transport infrastructure and accordingly, CLLLP is promoting an extension of Southend to enable the delivery of significant improvements to the strategic transport infrastructure network that will realise the long-standing objectives of the Council arising from the original Local Transport Plan (LTP) and more recently within the latest iterations of the LTP. In particular, CLLLP has identified the potential for the development of land at The Wick, Bournes Green, which is capable of delivery in the short term, and can provide private and affordable family housing alongside contributions to the improvement of the strategic transport network.

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Plans for the expansion of the airport are continuing to take shape, but it remains imperative that the expansion of the airport is supported by improvements to the remainder of the strategic transport network. Without securing improvements in the strategic transport network at the earliest possible stage, there is a very significant risk that the expansion of the airport will fail to fulfil its full potential.

The extension of Southend provides an opportunity to plan comprehensively for improvements to infrastructure, including the potential to facilitate improvements to Garon Park. Indeed, Garon Park could be served by a new link road and associated development could be designed around an expanded park that would form the focus of growth and provide a green lung for both Southend and Rochford.

It is noted that in response to previous representations submitted on behalf of CLLLLP the Council has confirmed that it has committed to commence a review of the Core Strategy, which is scheduled to start with the Regulation 25 stage, before the end of 2011. This is welcomed by CLLLLP, as it will allow an opportunity to consider the scale and routing of the necessary improvements to the strategic transport infrastructure network, alongside a comprehensive review of housing provision targets.

It is also noted that work has commenced on the production of LTP3, with evidence base having been prepared and initial consultation having been undertaken. CLLLLP recognises the importance of LTP3 in the delivery of the necessary improvements to the strategic transport infrastructure network and wishes to ensure that revised Core Strategy reflects the proposals contained within LTP3 as they emerge.

The importance of development finance to the delivery of improvements to the strategic transport infrastructure network have arguably never been more important than they are in the context of reduced public sector budgets emerging from the Comprehensive Spending Review and Budget 2011. Paragraph 1.23 of the DMDPD provides a summary of the issues facing the Council in the delivery of new houses, employment opportunities and infrastructure schemes, which is considered to be a realistic assessment of the issues faced. However, CLLLLP is concerned that paragraph 1.24 is worded in such a way as to indicate that the Council is seeking to plan for a time when the economy recovers in the long term, rather than seeking to address matters arising in the short term. As these matters include the need to provide improvements to the strategic transport infrastructure network, in particular those needed to fulfil the business and tourism potential relating to the expansion of Southend airport, as well as the timely delivery of family housing to meet the needs of the local population, CLLLLP considers it is important that the wording of paragraph 1.24 clarifies this point for the avoidance of doubt.

The DMDPD fails to make any reference to the Community Infrastructure Levy (CIL) within the document, which CLLLLP considers to be a significant missed opportunity, particularly in the context of the urgent need for the delivery of improvements to the strategic transport infrastructure network, to which all development should be expected to contribute.

In this context, we set out below the key issues arising from the Proposed Submission Development Management DPD.

b) Low Carbon Development and Efficient Use of Resources

The aims and aspirations of the Council in seeking to secure low carbon development and the efficient use of resources are supported by CLLLLP.

However, there are considered to be tensions between the wording of Policy DM2 and the introductory text, in particular paragraph 2.14, which confirms that the Council will apply exceptions where it has been demonstrated that the requirements are not viable or feasible. This proposed flexibility is not reflected in the wording of Policy and CLLLLP considers that part 2(ii) of the policy should be revised to better reflect the proposed flexibility.

Furthermore, in light of changes to the definitions contained within the Code for Sustainable Homes, the importance of ensuring the DMDPD does not simply repeat the requirements of other legislation and does not include policies that date it quickly upon adoption, CLLLP considers that the policy should also be revised to be less prescriptive.

c) The Efficient and Effective Use of Land

Representations submitted to the Issues and Options DMDPD sought the wholesale review of the approach to Policy DM3 in light of changes to the classification of backland and infill land in PPS3. In response to these representations the Council referred to the retention of the target and trajectory for delivery of residential development on previously-developed land.

Recent announcements from the Government have confirmed the removal of the national minimum target for the delivery of residential development on previously-developed land. This relaxation of national targets provides local authorities with the freedom to plan for growth that better reflects the needs to secure infrastructure delivery and family housing and reduces the prospect of losing vital community facilities to residential conversions.

In the context of Southend, where the need for family housing far outstrips the need for high density flatted developments, it provides the Council with the necessary freedoms to provide the type of housing required by local residents and sought by Council Members alike. Indeed, the concerns over town cramming amongst Council Members have arisen as a result of the provision of a large predominance of flatted developments.

In combination, the changes to PPS3 and the removal of the national minimum target for the delivery of residential development on previously-developed land provides the Council with the necessary basis for the wholesale review of the development strategy for Southend.

d) Sustainable Transport Management and Opportunities for Community Infrastructure Levy

The section concerning Sustainable Transport Management is admirably brief and concise, but in being so, CLLLP considers that it fails to adequately address the concerns of the local population regarding the high levels of traffic congestion, arising from the pressure on existing transport infrastructure and the high levels of out-commuting.

Whilst the Policy proposed in the DMDPD is worded in a sufficiently generic way to address the majority of issues arising in relation to sustainable transport, CLLLP would recommend that the supporting text to the policy is revised to confirm the role of the LTP is securing improvements to the strategic transport network.

By creating a closer link between the DMDPD and the LTP through more meaningful cross-references, there is a greater prospect of achieving the necessary for improvements to the strategic transport infrastructure network. Alongside this, reference should be made within the Sustainable Transport Management of the DMDPD to the intentions of the Council regarding CIL, to ensure all future development provides for improvements to the strategic transport network.

e) Conclusions

Previous representations to the Issues and Options DMDPD confirmed that the Council should look to reflect the changes to the planning system arising from the recent announcements by the Secretary of State for Communities and Local Government and the Minister for Decentralisation. Whilst the changes to the planning system continue to emerge, it is important that the DMDPD maintains sufficient flexibility to respond to future changes in national policy direction.

In this regard, the commitment of the Council to the early review of the Core Strategy is welcomed. This will provide the Council with an opportunity to reconsider the wider spatial strategy of focussing development within the central area at the expense of development to the north of the Borough, recognising that the north of the Borough provides the only reservoir of strategic development land.

In the interim, the Council should:

- Clarify that the DMDPD seeks to plan for the long-term growth of Southend, whilst seeking to invigorate investment and growth in the short term to contribute to lifting the Country out of the economic crisis that it currently faces;
- Embrace the changes to the planning system being brought into effect by the Government which seek to restrict town cramming, increase the provision of family housing, restrict the over development of existing urban areas, remove the unrealistic targets for delivery on previously-developed land (reducing the prospect of the loss of vital community facilities to residential conversion);
- Include greater cross references with the LTP to provide a greater prospect of achieving the necessary for improvements to the strategic transport infrastructure network; and
- Include reference to the intentions of the Council regarding CIL, to ensure all future development provides for improvements to the strategic transport network.

In addition to the above, CLLLLP remains concerned that the reliance on the development of central brownfield sites for high density development will not deliver what the market, or residents (both current and future) of Southend require in many instances is not economically viable and in particular will put the delivery of affordable housing at risk. However, CLLLLP recognises that the resolution of many of these issues (alongside the provision of policies for the reworking/reuse of town centre car park sites for alternative uses; the demand for school places and under-provision of education facilities; the levels of deprivation and the need to seek a better balance of age cohorts in certain wards; the heavy reliance on long-established employers; pressure on open space for development in the urban area; and the lack of accessibility to opens space, leisure and recreation) needs to be addressed in the early review of the Core Strategy. To this end, CLLLLP looks forward to making a positive contribution to the early review of the Core Strategy.

Finally, CLLLLP wishes to reiterate its request to formally register with the Council to appear at all stages of the Examinations relating to the DPDs, including the pre-hearing meeting and any planned hearing sessions whereby issues raised in the context of this letter are to be discussed.

Iceni and Stratland Management Ltd, on behalf of CLLLLP trusts that the Council will find these representations to be constructive and helpful in taking forward the policies of the DMDPD. Should you wish to discuss any aspect of these representations further, please do not hesitate to contact us.

Yours faithfully,

David Churchill
DIRECTOR

