

[REDACTED]
Date

28 March 2019

Department

Planning Policy Team
[REDACTED]

Submitted by email only

Consultation Response to the Southend New Local Plan Issues and Options Consultation

Dear Sir or Madam,

Thank you for inviting Basildon Borough Council to provide comments as part of Southend-on-Sea Borough Council's consultation on its Regulation 18 New Local Plan Issues and Options.

It is recognised that this current consultation will inform the preparation of a preferred approach, which will be made available for consultation next winter (2019/20).

Basildon Borough Council has considered the consultation document, and strategic and cross boundary matters which are covered by the Duty to Cooperate. It wishes to make a series of observations in light of this, which are aligned where possible to the questions set out in the document.

Duty to Cooperate

Before commenting on specific matters, it is important as a South Essex authority to comment on how the Issues and Options document responds to the Duty to Cooperate. At page 7 of the Issues and Options document the relationship between the Southend-on-Sea New Local Plan and the work of ASELA on the South Essex 2050 vision and the Joint Strategic Plan (JSP) is set out. This clearly shows that the Southend-on-Sea New Local Plan will be informed by the South Essex 2050 Vision and the work on the JSP.

At this stage in the plan-making process for the Southend-on-Sea New Local Plan, there are no general concerns with the approach being taken in its preparation with regard to the Duty to Cooperate. It would appear that the aspiration is to align the work on the Southend-on-Sea New Local Plan with the preparation of the JSP so that the proposals contained within each align. Basildon Borough Council welcomes this alignment, and welcome continued engagement with Southend through ASELA and on the JSP and other related projects.

Overall Approach

The proposals for the Southend-on-Sea New Local Plan are based on the objective of achieving the United Nations Sustainability Goals, which aligns with both the requirements of legislation and the NPPF. At this stage in the plan-making process for the Southend-on-Sea New Local Plan, there are no general concerns with this approach which clearly embeds sustainable development objectives in the plan-making process. Basildon Borough Council supports the approach being taken to the incorporation of the UN Sustainable Development goals at the heart of the plan-making process, and notes that the Issues and Options report goes a long way towards meeting these anticipated goals.

Spatial Strategy (Question 1.4)

Basildon Borough Council has considered the three spatial options under consideration by Southend-on-Sea Borough Council for inclusion in its Local Plan. It is recognised that Southend is constrained, and its spatial options are somewhat limited.

Having regard to the three spatial options set out in the Issues and Options Document, Basildon Borough Council wishes to indicate support for Option 3, as it does the most to meet the full objectively assessed need for housing arising from Southend Borough, and also contributes most effectively to meeting the overall needs of the South Essex Housing Market Area. However, due to the potential impacts Option 3 would have on the A127 Basildon Borough Council would expect the impacts of this proposal on the Strategic Road Network to be tested through a transport model that covers the whole length of the A127, or ideally the whole extent of the South Essex area. It is recognised that this may need to occur as part of the process of preparing the JSP in order that the cumulative impacts of growth along the A127 corridor are captured. Basildon Borough Council would wish however to be kept apprised of the outcomes of any such modelling in the event it is not delivered through South Essex wide joint working arrangements.

In addition to the above, Basildon Borough Council also wishes to indicate support for Southend-on-Sea Borough Council in undertaking an *Urban Living Study* to ensure that they are making the best use of land in the existing urban area, protecting the wider South Essex landscape from unnecessary encroachment from development.

Housing – Gypsy and Traveller Accommodation (Question 2.7)

The Issue and Options report uses the Essex-wide Gypsy and Traveller Accommodation Assessment to conclude that there is no local need for Gypsy and Traveller sites in Southend. This conclusion overlooks the need for transit sites. As is frequently reported in the local press, Southend experiences Gypsy and Traveller incursions regularly throughout the summer months, and it may therefore be necessary to consider the need for a transit site in order to address this issue. It is the intention of the Essex authorities through the Essex Planning Officers Association to prepare an addendum to the Essex wide Gypsy and Traveller Accommodation Assessment which looks at the need for transit sites, and Southend should partake in this work, and use its results to inform its emerging New Local Plan. Failure to plan for this need results in Gypsies and Travellers having to move across the area in search of sites, and this is therefore a cross-boundary issue. Basildon Borough Council

therefore seeks for Southend-on-Sea Borough Council to plan for transit sites and to effectively participate in joint Essex wide work to develop the evidence needed for this purpose.

Economic Growth (Question 3)

Basildon Borough Council supports the proposals for employment growth set out in the Issues and Options report which see a focus around office growth and around existing clusters. This because office growth, whilst generating staff movements, does not generate lorry movements which can congest the local road network and contribute towards poor air quality. Staff movements can be more readily met through public transport options, particularly in the town centre. It is however noted that the area around Southend Airport is identified as a growth cluster, as it the northern Southend corridor. Any economic growth in these locations should be modelled for its transport impacts due to the potential impact this would have on the A127 corridor. Again, this would ideally be done using a transport model that covers the whole length of the A127, or ideally the whole extent of the South Essex area. Basildon Borough Council would wish however to be kept appraised of the outcomes of any such modelling in the event it is not delivered through South Essex wide joint working arrangements.

Tourism (Question 4)

It is recognised that tourism is a key component of the economic development strategy for Southend, building on the attraction of the seafront area. It is noted that there is a partnership strategy in place to further harness the tourism potential of Southend by making it *England's leading coastal tourism destination*. However, for this strategy to work good accessibility to the seafront area is vital, and it is noted that a strategy is currently being developed in this regard looking a range of options for resolving the congestion that occurs in the seafront car parks on sunny days. Whilst some of the solutions involve public transport improvements, the majority seem to focus around managing car-based journeys such as 'park and ride', improved road side signage and car park/traffic management. There is a concern that car-based solutions, whilst resolving local issues may exacerbate congestion on the strategic road network on sunny weekends, where queues on the A127 Southend bound already extend back to at least the Fairglen Interchange. It is therefore expected that any 'park and ride', car parking and traffic management solutions are modelled using not just a local model, but a wider that covers the whole length of the A127, or ideally the whole extent of the South Essex area, to understand their true implications. Basildon Borough Council would wish however to be kept appraised of the outcomes of any such modelling in the event it is not delivered through South Essex wide joint working arrangements.

Further to this, there is a concern about promoting further activity in and around the seafront area which may impact on the natural environment. The Benfleet and Southend Marshes SPA extends along the foreshore in Southend and is important as a habitat both for migratory birds during the winter months and breeding birds during the summer months. Various Habitat Regulation Assessments for plans across Essex have highlighted the sensitivity of this habitat to recreational disturbance. Recent work on the Essex Coast Recreation Avoidance and Mitigation Strategy (RAMS) has identified how the impacts of residential growth, and its resultant recreation impacts

can be mitigated. However, there is a risk that if Southend focus on tourism growth in this location that any positive effects of the mitigation strategy may be undermined, and adverse harm may arise. It is therefore important that any growth in tourism is also subject to an avoidance and mitigation strategy which integrates with the existing RAMS intended to mitigate residential growth.

Town Centre (Question 5)

Basildon Borough Council supports the approach Southend-on-Sea Borough Council intends to take to maintaining the vibrancy and vitality of the town centre, optimising its unique selling points.

Sustainable Transport – the A127 (Question 6.1)

As set out in the responses to previous questions, the effective operation of the A127 is critical to Basildon, and there are a number of proposals within the Southend Issues and Options document which have the potential to impact on the A127. Therefore, Basildon Borough Council wish to reiterate the need for a coordinated cross boundary approach to securing improvements to the A127, which addresses the cumulative impact of growth along its entire route and sets out improvements which make the entire route operate effectively rather than just deal with existing pinch points resulting in the congestion just moving elsewhere along the route.

Sustainable Transport – Rail Service Capacity (Question 6.1)

The effective operation of rail services is also critical to Basildon, and again there are a number of proposals within the Southend Issues and Options document which have the potential to impact on the capacity of rail services, affecting those further down the line. Therefore, Basildon Borough Council would welcome joint discussions between the South Essex authorities and the rail service providers and Network Rail in order to ensure that rail capacity is improved to accommodate the cumulative impacts of growth along the line, including a new settlement as proposed in the Issues and Options document.

Sustainable Transport – access to the new settlement (Question 6.2)

As set out in Basildon Borough Council's response to the spatial strategy this proposed settlement is likely to impact on the A127, and therefore Basildon Borough Council would wish to reiterate the need for the access to this location to be incorporated into a coordinated cross boundary approach to securing improvements to the A127, which addresses the cumulative impact of growth along its entire route and sets out improvements which make the entire route operate effectively whilst enabling access to this growth location.

Sustainable Transport – Park and Ride (Question 6.4)

As set out in the response above relating to tourism, there is the potential for car based access improvement options to potentially exacerbate congestion on the strategic road network by making car based journeys more desirable compared to currently. Park and ride provision has the potential to do this. Consequently, Basildon Borough seeks

for any proposals for park and ride provision to be incorporated into a coordinated cross boundary approach to securing improvements to the A127, which addresses the cumulative impact of growth along its entire route and sets out improvements which make the entire route operate effectively.

Sustainable Transport – use of the Thames (Question 6.6)

Basildon Borough Council notes that there is a suggestion within the plan about making greater use of the river Thames as a transport corridor. However, it is not clear as to the viability of a frequent service for either tourists or commuters using the river. The realistic prospect of this proposal being delivered is therefore doubtful, and Basildon would be concerned about any assumptions being made in respect of modal shift to this means of travel in any transport modelling undertaken.

The opportunity should however be considered through ASELA as the provision of such a service may have more scope for delivery if consideration was given to utilising other destinations as stopping points along the river, such as Canvey and Grays, which have deep water access points.

Natural Environment (Question 9)

The Benfleet and Southend Marshes SPA, a Natura 2000 site, stretches along the foreshore in Southend. It is recognised on page 59 of the Issues and Options document that this means that recreational and leisure pursuits on the foreshore will require careful planning to ensure that this designated habitat is protected from harm. It goes on to indicate that initiatives are currently being developed to combat the impact of increased housing development on recreational pressure. This is in reference to the Essex Coast RAMS. However, it should be noted that the purpose of that strategy is to off-set the harm arising from housing growth only, and not the potential harm arising from increased promotion and provision of tourism facilities and services along the foreshore. It is therefore necessary for Southend to consider how their approach to tourism will impact on the recreational pressures on the foreshore, and contributed towards any additional mitigation required to address its impacts.

I trust this consultation response is of assistance to you in taking forward the Southend Local Plan. If you wish to discuss any of the matters raised further, please do not hesitate to contact Amanda Parrott using the details provided at the top of this letter.

Yours sincerely,



Head of Planning

Basildon Borough Council


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