

**Southend-on-Sea Borough Council**  
**Department for Place**

**Director of Planning and Transport : Peter Geraghty**

 Civic Centre, Victoria Avenue, Southend-on-Sea, Essex SS2 6ER

 01702 215000

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Matthew Winslow  
Service Manager Strategic Planning and Housing  
Strategy  
Local Plan Publication,  
Basildon Borough Council,

Our ref:  
Your ref:  
Date: 28<sup>th</sup> March 2019  
Telephone: 01702 215358  
Email: [marksheppard@southend.gov.uk](mailto:marksheppard@southend.gov.uk)

**Basildon Local Plan Borough Revised Publication – Post Revised Publication Letter**

Dear Matthew

This letter serves as a position statement from Southend Borough Council on observations concerning the Local Plan and verifies that it considers that the Basildon Borough Revised Publication Local Plan consultation process has met the statutory provisions of a 'duty to cooperate'.

If necessary a separate Statement of Common Ground can be agreed at a later date between both Councils.

Southend on Sea Borough Council did not respond to the Regulation 19 consultation. It had engaged fully in the development of the Plan prior to that and during opportunities at ASELA, the JSP Members Steering Group and in specific Duty to Cooperate workshops help by Basildon Council.

Yours Sincerely

A solid black rectangular box used to redact the signature of Mark Sheppard.

Mark Sheppard  
Team Leader Strategic Planning

T: 01702 215358

E: [marksheppard@southend.gov.uk](mailto:marksheppard@southend.gov.uk)

## **1. Introduction**

- 1.1 The Basildon Borough Council published a revised Local Plan for the whole of the Basildon Borough for public consultation purposes under Regulation 19 in October 2018.

## **2. Duty to Cooperate**

- 2.1 The National Planning Policy Framework (NPPF, 2019) provides that local planning authorities are under a duty to cooperate with each other on strategic matters that cross administrative boundaries (paragraph 24).
- 2.2 In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere. In order to demonstrate effective and on-going joint working statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these should be published (paragraphs 26 and 27).
- 2.3 The NPPF also sets out tests of soundness that a Local Plan must meet at examination to assess whether they have been prepared in accordance with legal and procedural requirements. One of these is to ensure that the plan is deliverable over the plan period and is based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground (paragraph 35e).

## **3. Joint Working**

- 3.1 To effectively meet these provisions the six South Essex local authorities of Basildon, Brentwood, Castle Point, Rochford, Southend-on-Sea and Thurrock, together with Essex County Council, established the Association of South Essex Local Authorities' (ASELA) in January 2018 to take joint work forward on a number of important issues.
- 3.2 To guide these issues ASELA has developed a long term growth ambition to underpin strategic spatial, infrastructure and economic priorities across the sub-region. The South Essex 2050 Ambition is now being taken forward through a number of work streams to develop a spatial strategy, including a Joint Strategic Plan (JSP).
- 3.3 The Strategic Plan will implement the spatial strategy of the South Essex 2050 Ambition.

### ***South Essex Joint Strategic Plan (JSP)***

- 3.4 The Joint Strategic Plan has been under preparation for some two years with a Project Delivery Board in place reporting through a Member structure to ASELA with an agreed timetable and scope of work. A Statement of Common Ground was published in June 2018 and has been formally agreed by all partners alongside an update to each authority's Local Development Scheme.
- 3.5 Evidence based studies and related work has been completed, or is still progressing, on a number of important issues which will inform the preparation of the JSP. This includes a Strategic Housing Market Assessment (SHMA), Strategic Growth Locations Study (SGLS) and Economic Development Needs Assessment (EDNA).

- 3.6 Whilst the growth offer of South Essex is potentially significant, evidence base studies have already highlighted the significant challenges that face the area in realising these. Major investment in transport and other infrastructure is needed to raise it to a level of quality that is fitting for an area neighbouring a World City; there are weaknesses in business growth and the skills needed to take full advantage of the diverse economic base; and there are challenges in meeting the Governments standardised housing need targets given the limited land resources and extensive Metropolitan Green Belt which extends across South Essex from London. There are also challenges in ensuring that growth happens in a way that enhances the environmental offer, particularly in terms of green space, air quality and impact on climate change.
- 3.7 The JSP will seek to address these challenges and to provide the strategic planning framework for South Essex to guide the preparation of all six local planning authority Local Plans.

#### 4. **Basildon Borough Revised Publication Local Plan**

- 4.1 Following the publication of iterative stages of its local plan, the Basildon Borough Council has prepared its revised publication for public comment covering the period from 2014 to 2034 to accommodate sustainable development and growth.
- 4.2 Whilst the Southend Borough Council considers that the Plan has met its statutory obligations under the duty to cooperate, it has the following observations on the Plan.

#### **Strategic Matters**

##### ***Housing***

- 4.3 The Governments Standard Methodology for assessing local housing needs identifies a housing need of around 1,000 per annum. However, the Local Plan identifies land to accommodate at least 17,791 homes. When housing supply is compared the scale of unmet need is identified to be around 10% of the housing requirement.
- 4.4 The Southend Borough Council notes that development within the urban areas of Basildon Borough will not meet the assessed housing need and that this has led to exceptional circumstances justifying the release of Green Belt land following a detailed assessment of the Green Belt.
- 4.5 Whilst it is noted that due to environmental reasons and the need to retain an effective Green Belt, as well as the phasing of development the unmet housing need cannot be fully identified in the Basildon Borough, ***the Southend Borough Council would wish to reiterate its own position regard to housing delivery as set out in its letter to Basildon Borough Council dated 3<sup>rd</sup> October 2018 (see Appendix 1), that it cannot meet any of Basildon's identified unmet housing need.***
- 4.6 It is noted in the 'broad locations for housing growth' that both of the sites identified (land south of Cray Hill and area to the south of Wickford) align the A127 which already suffers from significant traffic congestion. The statement in paragraph 6.45 that 'the Council will reconsider these locations for housing growth in the next Local Plan review, allowing time for sustainable development proposals to be identified and proposals for the A127 to be further developed within the Joint Strategic Plan' is therefore welcomed by the Southend Borough Council.

- 4.7 The Southend Borough Council therefore supports Policy SD2 'Settlement Hierarchy and the Distribution of Growth' point 8. However, it is considered that this policy provision should make specific reference to the Joint Strategic Plan as set out in the supporting text.

### ***Transport and Infrastructure***

- 4.8 The Southend Borough Council welcomes the statement in paragraph 6.30 that whilst infrastructure proposals in the plan are largely confined to the Borough's geographical extent, the Local Plan 'recognise(s) the need for improvements to strategic infrastructure, such as the A127, A13 and A130, to support the cumulative impacts of growth in South Essex. The Joint Strategic Plan will therefore provide a new opportunity for infrastructure to be considered at a strategic level, rather than just at a local level, and consequently, different approaches to infrastructure provision may be identified in the future. This may give rise to new opportunities for growth, as land or sites which are not currently suitable and/or available are opened up. It will therefore be necessary to review the Local Plan in the future, if new approaches to infrastructure provision open up new opportunities for growth in the Borough'.
- 4.9 Similarly the Southend Borough Council supports the draft Policy SD1 'A Strategic Approach to Sustainable Development in Basildon Borough' which states at point 7 that 'this Local Plan will be reviewed, at least in part, following the adoption of the Joint Strategic Plan for South Essex, if opportunities for further growth and infrastructure provision in Basildon Borough are identified'.
- 4.10 The Southend Borough Council also welcomes the Plan's provisions to safeguard land that may be required for transport infrastructure improvements in the future (including the A127 corridor) as a result of the publication of the Joint Strategic Plan, and as set out in Policy T5 'Transport Improvements Area'.

### ***Economic Development***

- 4.11 The Southend Borough Council welcomes draft Policy SD1 'A Strategic Approach to Sustainable Development in Basildon Borough' point 1 which states that the Basildon Borough Council 'will work with neighbouring authorities in South Essex to bring forward a Joint Strategic Plan for sustainable growth in South Essex which seeks to deliver at least 90,000 homes and 58,000 jobs'
- 4.12 Southend Borough Council also welcomes the approach of the Basildon Revised Publication Local Plan in seeking to embrace economic growth and prosperity as set out in draft Policy SD1 'A Strategic Approach to Sustainable Development in Basildon Borough' point 5 and Policy E1 'Economic Growth Strategy'. It is noted that the Plan proposes to make provision for 92ha of land for employment purposes to deliver a total jobs growth of at least 20,000 jobs within the Basildon economy.

### ***Implementation***

- 4.13 In relation to the implementation of the Basildon Local Plan, the Southend Borough Council welcomes Policy IMP1 'Implementation Strategy' which seeks to phase development to ensure that infrastructure capacity is created to accommodate additional people and vehicles together with Policy IMP3 referring to the phasing of development.

- 4.14 However, it is considered that this section of the Plan would benefit from a cross-reference to Policy SD1 which provides that the Local Plan will be reviewed, at least in part, following the adoption of the Joint Strategic Plan for South Essex, if opportunities for further growth and infrastructure provision in Basildon Borough are identified.

### **Other Matters**

#### ***Vision***

- 4.15 Whilst welcoming the objectives and aims of the vision, the Southend Borough Council would suggest that it would be enhanced if it also made reference to sustainable development; the need to address infrastructure provision and climate change.

#### ***Strategic Objectives***

- 4.16 Similarly in the Strategic Objectives it is considered important that 'climate change' is identified as a specific Strategic Objective.

#### ***Affordable Housing.***

- 4.17 Policy H26 relating to securing affordable housing provision in development schemes is welcomed.

#### ***Green Infrastructure***

- 4.18 Policy NE1 'Green Infrastructure Strategy' (points 1 and 2) which seeks to improve the network of green spaces as part of a sub-regional green grid approach is supported as is the provisions to develop an Essex Coast Recreation disturbance Avoidance Mitigation Strategy (RAMS) in partnership with other affected Essex local authorities.

## Appendix 1

### Copy of Letter to Basildon Borough Council Dated 3rd October 2018 Basildon Borough Local Plan 2014 – 2034: Duty to Co-operate Unmet Housing Needs

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#### Southend-on-Sea Borough Council

##### Department for Place

Director of Planning and Transport: Peter Geraghty

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Scott Logan  
Chief Executive  
Basildon Borough Council

Our ref:  
Your ref:  
Date: 3<sup>rd</sup> October 2018  
Telephone:  
Email:

Dear Mr Logan,

#### **Basildon Borough Local Plan 2014 – 2034: Duty to Co-operate Unmet Housing Needs**

Thank you for your letter dated 14<sup>th</sup> September 2018 regarding the above.

The Southend Borough Council notes and welcomes the strong commitment of the Basildon Borough Council to work in partnership in the preparation of a Joint Strategic Plan for South Essex and its endeavours to try and accommodate all of its objectively assessed housing needs within its own administrative area.

It is noted that due mainly to a delivery lag, it is scheduled for a housing shortfall of 1,700 homes over the plan period to 2034 and requests partners views as to whether this unmet need can be accommodated within any of the South Essex local planning authority areas.

In the case of Southend, I am afraid that it is very unlikely that we will be able to assist in contributing to any of Basildon's objectively assessed housing need.

Our own local plan preparation is only just commencing and we have not yet consulted on our first phase an 'Issues and Options' report. Research and evidence gathering has, however, been taking place for the past year or so. The New Southend Local Plan will cover the period to 2038.

Southend is facing a similar dilemma to Basildon in so far as the emerging evidence suggests that we will not be able to meet our own objectively assessed housing need

within our administrative boundary. Southend will therefore, need to explore how best to meet this challenge and work with adjoining local authorities through the duty to cooperate as to how it can meet its need in full.

Given these circumstances I do not envisage a situation where Southend itself would be able to assist other local authority partners in South Essex in meeting their objectively assessed housing needs. Should this situation change in any way I will of course keep you informed as part of the preparation of the South Essex Joint Strategic Plan.

Yours sincerely



**Peter Geraghty**  
Director for Planning & Transport