

Sustainability Appraisal (SA) of the Southend Local Plan

Interim SA Report

July 2025

Quality information

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1. Introduction

1.1. Background

- 1.1.1. AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Southend Local Plan that is being prepared by Southend-on-Sea City Council.
- 1.1.2. Once adopted, the Local Plan will set a strategy for growth and change up to 2040, allocate sites to deliver the strategy and establish policies against which planning applications will be determined.
- 1.1.3. SA is a mechanism for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. SA is required for local plans.¹

1.2. SA explained

- 1.2.1. It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes (SEA) Regulations 2004.
- 1.2.2. In-line with the Regulations, a report (known as the **SA Report**) must be published for consultation alongside the draft plan that presents an appraisal of “the plan and reasonable alternatives” with a particular focus on appraising “significant effects”.
- 1.2.3. More specifically, the SA Report must:
 - explain **work to date** and, in particular, appraisal of ‘reasonable alternatives’;
 - present **an appraisal of current proposals**, i.e. the Draft Plan; and
 - explain **next steps**.
- 1.2.4. The report must then be taken into account, alongside consultation responses, when finalising the plan.

1.3. This Interim SA Report

- 1.3.1. The current consultation is on a draft plan under Regulation 18 of the Local Planning Regulations, with the intention to subsequently consult on the final draft (‘proposed submission’) version under Regulation 19. Specifically, the current consultation is focused on a “Preferred Approach with Options”.
- 1.3.2. As such, this is not the formal SA Report but an ‘Interim’ SA (ISA) Report.
- 1.3.3. A final point to note is that this report integrates **Equality Impact Assessment (EqIA)**, as discussed further in Section 3.

Structure of this report

- 1.3.4. This ISA Report aims to present all of the information required of the SA Report and so is structured in **three parts** covering “work to date”, “an appraisal of the current proposals” and “next steps”.
- 1.3.5. Ahead of Part 1, there is a need for two further introductory sections:
 - Section 2 – introduces the Local Plan’s scope.
 - Section 3 – introduces the SA scope.

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2024). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the ‘Proposed Submission’ plan document.

2. The Local Plan's scope

2.1. Introduction

- 2.1.1. The aim here is to briefly introduce the context to plan preparation, including the national context of planning reform; the plan area (ahead of more detailed discussion below); the plan period; and the objectives that are in place to guide plan preparation.

2.2. Context to plan preparation

- 2.2.1. Plan-making has been underway for several years, and with considerable urgency because the adopted Southend Core Strategy dates from 2007 and looked ahead only to 2021, whilst the NPPF expects plans to be reviewed every five years and look ahead 15 years, including in terms of identifying a supply of land sufficient to meet development needs.²
- 2.2.2. There is also considerable urgency to adopt a new Local Plan with a view to ensuring that the Council is able to demonstrate and maintain a five year housing land supply (5YHLS), i.e. a rolling supply of demonstrably 'deliverable' sites with a total capacity sufficient to provide for the annual housing requirement (discussed below) over a total of five years. An inability to demonstrate a 5YHLS means that planning applications must be determined under the 'presumption in favour of sustainable development' (NPPF paragraph 11) and this has been a major issue locally over recent years. Specifically, the issue is that 'the presumption' means a 'tilted balance' in favour of granting planning permission, such that where the Council refuses an application there is a heightened risk of the application being permitted at appeal ('planning by appeal').³
- 2.2.3. Once adopted the Local Plan will set a new housing requirement and identify a supply, in line with a clear strategy, that is sufficient to demonstrate and maintain a 5YHLS. This is in the context of the NPPF explaining: *"The planning system should be genuinely plan-led."*
- 2.2.4. In summary, there is: A) 'top down' pressure to adopt a Local Plan given the expectations of the Government, as set out in the NPPF; and B) 'bottom up' pressure in the sense of a need to ensure that growth comes forward in a plan-led way, i.e. such that the City can avoid potentially problematic 'planning by appeal'.
- 2.2.5. Finally, and on a more positive note, there is a need to adopt a Local Plan that delivers on wide-ranging objectives regardless of the 'pressures' discussed above, for example:
- Providing for housing need is not only of great importance in-and-of itself, but also due to wide-ranging secondary benefits, e.g. affordable housing and the economy.
 - Plan-led housing growth creates an opportunity to target infrastructure investment to realise benefits far in excess of what would otherwise be the case. This is for all types of infrastructure including green infrastructure, which can assist with local nature recovery.
 - Coordinated growth can deliver on regeneration objectives for the City Centre and other parts of Southend in need of intervention. Also, aside from regeneration, there are a number of important 'place-shaping' and 'place-making' opportunities to explore.
 - A local plan is an opportunity to consider development viability in a strategic way, such that a considered approach can be taken to policy 'asks' including housing mix, affordable housing, net zero development, residential design standards and more.
 - The Local Plan is a key opportunity to ensure a strategic approach in respect of a range of other key issues, including providing for employment land needs.

² A number of other development plan documents have been adopted by the Council in the period since the Core Strategy's adoption, including the Development Management Document, and Area Action Plans for Southend Central Area, and for London Southend Airport, as well as a Joint Waste Local Plan.

³ There is also a need to annually pass the Government's Housing Delivery Test (HDT), which is a test of whether the housing requirement has been delivered over the three most recent years. Essentially there is a need for a robust supply, as measured against the requirement, sufficient to pass both the HDT, which looks back, and the 5YHLS test, which looks forward.

2.3. The plan area

- 2.3.1. Southend is a unitary authority located at the southeast extent of Essex. Southend links very closely to Rochford District to the north and Castle Point Borough to the west, and these three authorities comprise the eastern half of the informal South Essex sub-region, which is then completed by Basildon, Thurrock and Brentwood to the west. To the south is the Thames Estuary and then north Kent, and it can be noted that the Thames Estuary as a whole has long been a national focus in terms of regeneration and growth.
- 2.3.2. The City is located some 40 miles east of London and is home to London Southend Airport. Southend grew following the opening of the railway line from London Fenchurch Street to Southend Central in the 1850's, followed by the line from London Liverpool Street to Southend Victoria in 1889. This connectivity led to Southend's population increasing from under 10,000 in 1890 to 150,000 in the mid 1940's, and the population is now circa 180,000.
- 2.3.3. Road connectivity is then more challenging, reflecting Southend's peninsula geography, with just one major (dual carriageway) route linking to the west, namely the A127 (with the A13 a single carriageway through residential areas as it passes through Southend and Castle Point, before then becoming a dual carriageway linking to the M25).
- 2.3.4. Southend stretches along a seven-mile foreshore leading to a linear built form. Centrally located is the city centre, which was at the centre of Victorian expansion; to the west is Leigh-on-Sea, which also saw significant Victorian expansion, with the two settlements having merged by the start of the 20th Century; and then to the east is Thorpe Bay which was developed in the 20th Century and then Shoeburyness, which has links to the military.
- 2.3.5. A total of nine neighbourhoods are defined across the urban area, and then to the north is a small area of undeveloped agricultural land, which falls at the eastern extent of the London Metropolitan Green Belt. Here there are close links to Rochford District, including the town of Rochford and London Southend Airport (which is mostly within Rochford) including its station. The Rochford boundary is also the boundary with Essex County Council.
- 2.3.6. The City is one of the most densely developed urban areas in the country outside London, which brings with it great vibrancy – in combination with the City's wealth of heritage, cultural and natural environment assets – but also a range of challenges, including recognising that Southend is a major seasonal tourist destination with associated issues.
- 2.3.7. A dense built form leads to challenges in respect of upgrading infrastructure and regenerating older neighbourhoods, and this is not helped by challenging development viability in some parts of the city. A solution can be to support targeted higher density schemes, but there is a risk of impacts to the low-rise prevailing character in many areas.
- 2.3.8. It is an inherent challenge, but a solution must be found, because housing needs are extensive, and ensuring that new housing is delivered alongside new infrastructure is a key priority for the Council. This is on the basis of known infrastructure capacity issues, and also in recognition of the fact that several neighbourhoods in Southend are amongst the 10% most deprived nationally and several others amongst the 20% most deprived.
- 2.3.9. Delivering new good quality homes is key to addressing socio-economic issues, but homes must come forward alongside jobs and infrastructure including schools, health facilities, safe walking/cycling routes, highways, sports and recreation facilities and green infrastructure.
- 2.3.10. Finally, by way of introduction, it is important to be clear that Southend is “a City of enterprise, culture and opportunity” (para 1.1 of the current draft plan).
- 2.3.11. Southend attracts over 7 million day visitors per year, which makes its success of larger-than-local significance, but this is also the case for the wider economy, with around 80,000 jobs currently in Southend as well as a university campus. Jobs are very diverse – with 86% of companies employing 10 staff or fewer – and this is a strength, but there are also employment hubs supporting larger businesses, namely the City Centre, London Southend Airport and associated business park, and employments areas along the A127/A1159.

Figure 2.1: Southend within South Essex

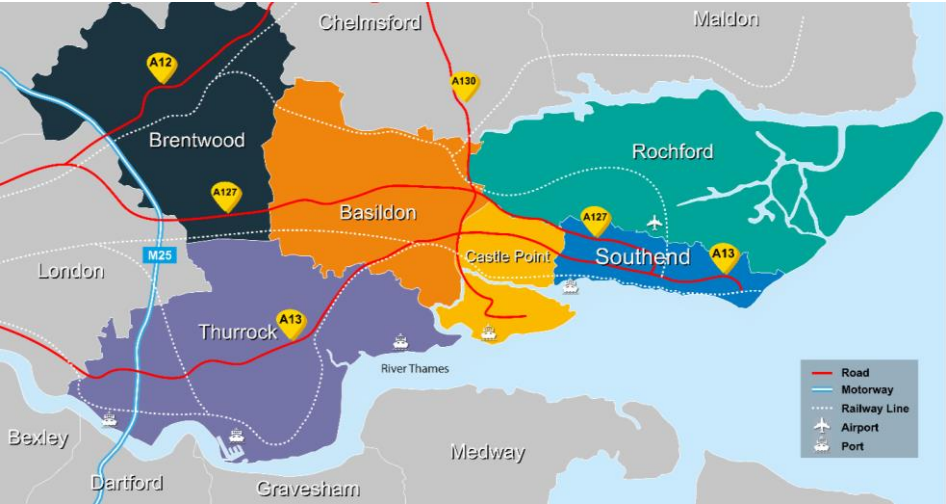


Figure 2.2: The defined neighbourhoods within Southend

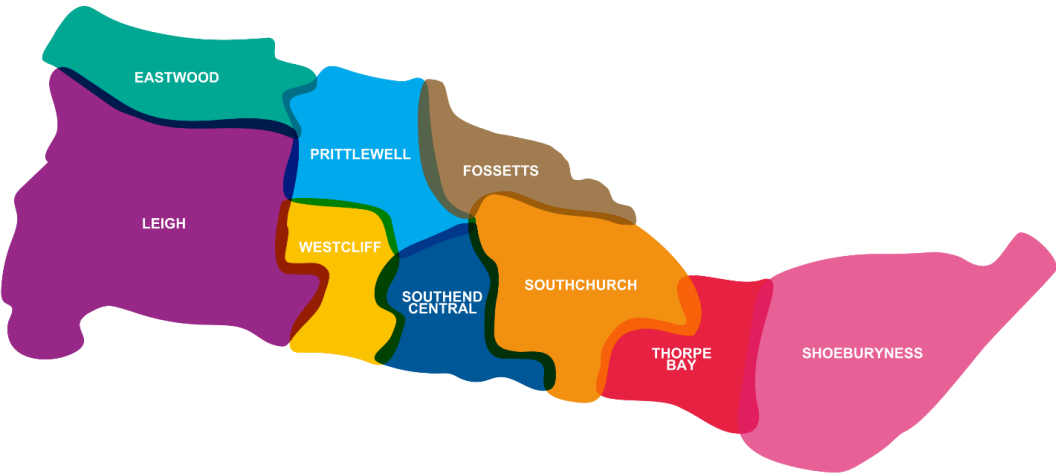
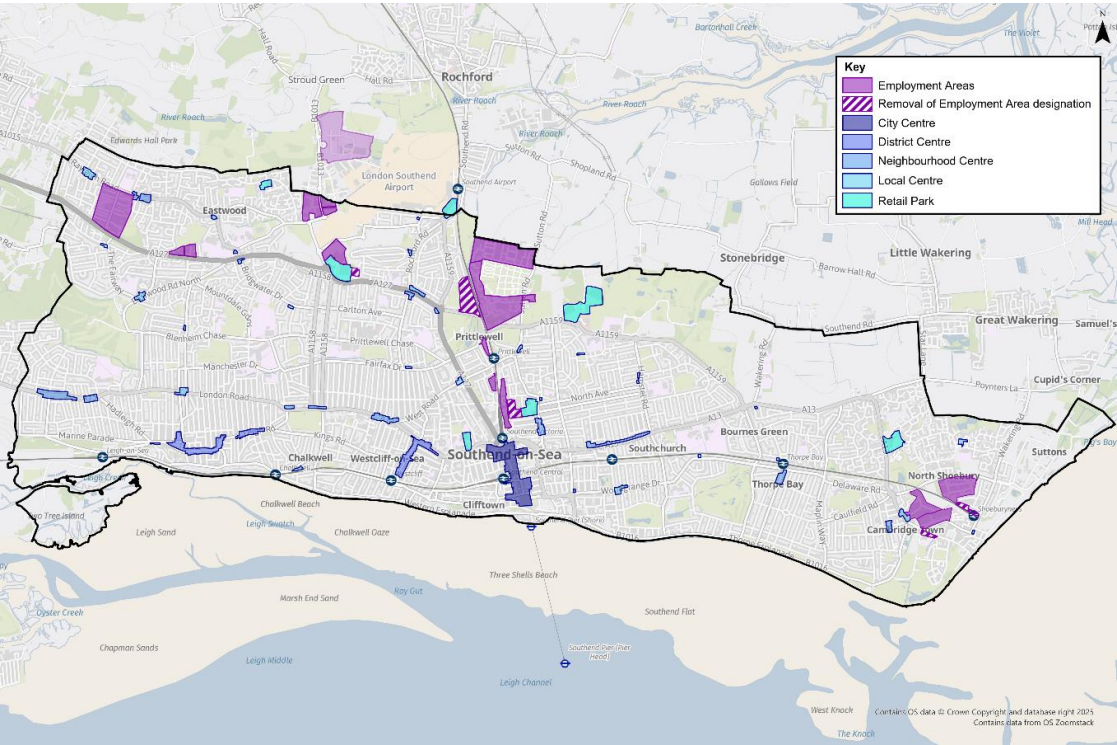


Figure 2.3: The City centre, other centres, employment areas and retail parks



2.4. The plan period

- 2.4.1. The plan period is 2023 to 2040, in light of NPPF paragraph 22 which states:

“Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities. Where larger scale developments such as new settlements or significant extensions... form part of the strategy for the area, policies should be set within a vision that looks further ahead...”

- 2.4.2. With regards to the start of the plan period ('base date'), 2023 reflects the fact that plan-making has been delayed, and some work has already been completed to establish development needs (etc) for a plan period from this date. Plan base dates can be kept under review, bringing them forward (closer to the point of adoption) if appropriate, and addressing any implications for development need/supply calculations.
- 2.4.3. With regards to the plan end date, 2040 has been the proposal since the start of the plan-making process. However, there is now a recognition that it may need to be extended, to ensure a plan that looks ahead 15 years from the point of adoption. Longer plan-periods support a vision-led approach including accounting for strategic infrastructure opportunities. However, on the other hand, there is a need to consider the national devolution agenda, under which sub-regional Spatial Development Strategies (SDSs) are forthcoming.

Completions and commitments

- 2.4.4. It is worth noting here that, as of the start of the plan period (1st April 2023) 173 homes have been completed and a further circa 4,000 homes are set to come forward at sites with planning permission. Similarly, in respect of employment land, some has been delivered since the start of the plan period and a significant amount has planning permission.
- 2.4.5. As such, a key Local Plan aim is to identify a supply of land to provide for development needs (as far as possible) over-and-above 'completions' and 'commitments'.

2.5. Plan objectives

- 2.5.1. It is important to set plan objectives early in order to guide the plan-making process. Also, the plan objectives are a key input to the SA process, because 'reasonable alternatives' must be defined taking account of *“the objectives... of the plan.”*
- 2.5.2. A starting point is the established Southend City Vision: *“Southend-on-Sea is a vibrant, welcoming and well-connected coastal city brimming with opportunities, seamlessly blending its rich heritage with a contemporary, creative outlook.”* The Vision prioritises the following themes: safe and thriving communities; bustling high streets and business spaces; haven for leisure and creativity; clean, green and proud.
- 2.5.3. Work has then been undertaken to turn this into a Vision for 2040 and with a specific focus on guiding the new Local Plan. The Local Plan vision is as follows:
- “Southend-on-Sea is prosperous and well connected, but with a quality of life to match. As a “City by the Sea” we have led the way on how to grow a sustainable, healthy and inclusive City that has made Southend more resilient to a changing climate. Together, the distinct neighbourhoods of Southend provide a diverse range of opportunities for people at all stages of their life, whilst improved infrastructure, facilities, green spaces and services are of high quality, easily accessible and support personal independence and a strong sense of community. We cherish our coastal identity, culture and celebrate our built heritage – a seafront that entertains and a shoreline, from the historic Shoebury Garrison to the fishing village of Old Leigh, which always inspires.”*
- 2.5.4. The following plan objectives then aim to build on the vision and guide plan-making:

• A City that is Healthy and Safe

- Deliver new and improved infrastructure to meet sustainable growth by pursuing an 'infrastructure led' approach.

- Contribute towards the delivery of sustainable, safe and healthy neighbourhoods.
- Reduce deprivation and reduce inequalities between neighbourhoods.
- Promote and protect community and sport and recreation facilities.

• **A City of Opportunity**

- Develop Southend's role as a major business centre attracting investment and providing new jobs, where both existing and new enterprises can prosper.
- Regenerate the City Centre to provide for a diversity of uses... complemented by a growing residential population, set within a quality and green environment.
- Establish Southend as a major resort and year-round destination and increase the value of the visitor economy.
- Secure the regeneration of Southend as a cultural and intellectual hub and a centre of education excellence.
- Provide a choice of homes for people at all stages of life.

• **A City to be Proud Of**

- Southend is the regions first choice coastal tourism destination, and the seafront and marine environment has been protected and enhanced.
- Enhance the built heritage and capitalise on it to promote tourism and regeneration.
- Maintain and enhance the distinct character and environment of the City's neighbourhoods to ensure that they remain vibrant, attractive and accessible.
- Create well designed and attractive places that respond positively to the distinctive character and historic value of the City's different neighbourhoods and enhances the natural environment.
- Make the most efficient and effective use of land and buildings and prioritise the use of previously developed land.

• **A City that is Green and Sustainable**

- Prevent or minimise the impact of climate change, including for air quality and flood risk and improve energy efficiency.
- Improve the quality and accessibility of green space whilst safeguarding environmental assets and enhancing biodiversity.
- Greening the City through extensive landscaping and tree planting to create a network of green spaces and corridors.
- Protecting and enhancing the quality of the coastal environment and its biodiversity.
- Regenerate and bring back into productive long-term use land that is contaminated or otherwise degraded, including where appropriate use for biodiversity...

• **A City that is Connected and Smart**

- Improve accessibility, connectivity, sustainability, safety and ease of movement to, from and within the City.
- Reduce the need to travel by achieving closer alignment of homes, jobs, infrastructure and services within a network of highly accessible neighbourhoods.
- Provide multi-modal transport facilities that achieve seamless and integrated connectivity between neighbourhoods, with neighbouring towns and beyond.
- Facilitate the sustainable growth of the Airport to realise its potential in becoming a carbon neutral regional transport hub that provides a range of job opportunities.
- Explore opportunities to utilise the Thames as a sustainable transport corridor for business and leisure use subject to protecting the coastal and marine environment.

3. The SA scope

Introduction

- 3.1.1. The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the appraisal of reasonable alternatives and the emerging plan. It does not refer to the scope of the plan (discussed above) nor the scope of reasonable alternatives (discussed in Part 1).
- 3.1.2. The aim here is to introduce the reader to the *broad scope* of the SA and does not aim to be comprehensive. It is important for the SA scope to remain flexible and able to respond to the emerging plan and reasonable alternatives, and the latest evidence-base.

Consultation on the scope

- 3.1.3. The statutory consultation bodies and neighbouring local authorities were consulted on the Scoping Report in 2017 and all responses received have been taken into account. Comments on the SA scope are welcome at the current time.

The SA framework

- 3.1.4. The key outcome of scoping work is the SA 'framework' under which subsequent appraisal can be undertaken, with a view to ensuring that appraisal is suitably focused. At the core of the framework is a list of sustainability objectives under topic headings.
- 3.1.5. The SA framework is discussed further below, but at its core are the following topics:
- Accessibility (to community infrastructure)
 - Air quality
 - Biodiversity
 - Communities
 - Climate change adaptation
 - Climate change mitigation
 - Communities and health
 - Economy & employment
 - Equality
 - Historic environment
 - Housing
 - Landscape
 - Soils and resources
 - Transport
 - Water
- 3.1.6. This list of topics reflects a modest adjustment since 2017, specifically: A) whereas the framework in 2017 had a 'Population and communities' topic and a 'Health' topic, there is now an 'Accessibility' topic and a 'Communities and health' topic; B) 'Climate change' from 2017 is now split into two topics; C) 'Land, soil and water' from 2017 is now split into two topics; and D) 'Landscape and historic environment' from 2017 is now split into two topics.
- 3.1.7. Finally, note that under the "equality" heading the appraisal aims to integrate **Equality Impact Assessment (EqIA)** as part of which consideration is given to the effects of the plan for groups of people with protected characteristics under the Equality Act 2010, namely age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

Part 1: Work to date

4. Introduction to Part 1

Overview

- 4.1.1. Two consultations have been held to date under Regulation 18 (in 2019 and 2021), prior to this current consultation also under Regulation 18. However, the aim here is not to relay the entire backstory, nor to provide an ‘audit trail’ of steps taken. Rather, the aim is to report work undertaken to examine **reasonable alternatives** in 2025. Specifically, the aim is to:
- explain the reasons for selecting the reasonable alternatives – see **Section 5**
 - present an appraisal of the reasonable alternatives – see **Section 6**
 - explain the Council’s reasons for selecting the preferred option – see **Section 7**
- 4.1.2. Presenting this information aligns with the requirement to present an appraisal of reasonable alternatives and “*an outline of the reasons for selecting the alternatives...*”

Reasonable alternatives in relation to what?

- 4.1.3. The requirement is to examine reasonable alternatives (RAs) taking account of “*the objectives and geographical scope of the plan*”, which suggests a need to focus on the **spatial strategy**, i.e. providing for a supply of land, including by **allocating sites**, to provide for objectively assessed needs alongside delivering on wider plan objectives. Establishing a spatial strategy is clearly a central objective of the Local Plan (indeed all local plans).⁴
- 4.1.4. Spatial strategy alternatives can perhaps more accurately be described as **alternative key diagrams**, where the key diagram is a reflection of established development requirements, spatial strategy and site selection. These can also be termed ‘**growth scenarios**’.
- 4.1.5. Housing and employment land are key matters to explore / vary across growth scenarios, but other land uses can potentially also be explored as a variable.

What about site options?

- 4.1.6. Whilst individual site options clearly generate interest, they are not RAs in the context of most local plans. Were the objective to allocate one site, then site options would be RAs, but that is rarely the case for local plans. Rather, the objective is to allocate a *package* of sites and so RAs must be in the form of alternative *packages* of sites, in so far as possible. Nonetheless, consideration is naturally given to the merits of site options as part of the process of defining RA growth scenarios (Sections 5.3 & 5.4).

What about other aspects of the plan?

- 4.1.7. As well as establishing a spatial strategy, allocating sites etc, the Local Plan must also establish policy on thematic district-wide issues, as well as site-specific policies. These can be broadly described as development management (DM) policies. However, it is a challenge to define “reasonable” DM policy alternatives, and, in this case, none are identified following discussion with Officers.⁴ DM policies are discussed further in Part 2 and, as part of this, informal consideration is given to the question of RAs, and another important consideration is the Government’s commitment to publishing National Development Management Policies (NDMPs), with these expected in 2025.⁵

⁴ Another consideration is that to be ‘reasonable’ alternatives must be meaningfully different to the extent that they vary in terms of **significant effects**, where significance is defined in the context of the plan (taken as a whole). A focus on key diagram RAs (‘growth scenarios’) guarantees that this will be the case and so negates the need for a process of screening what should and should not then be a focus of subsequent work to explore (i.e. define, appraise and consult upon) RAs. It is also important to note that appraising a draft proposal versus the ‘do nothing’ option does not equate to an appraisal of RAs, because do nothing is the baseline and there is a separate requirement, as part of the SA process, to appraise the draft plan against the baseline.

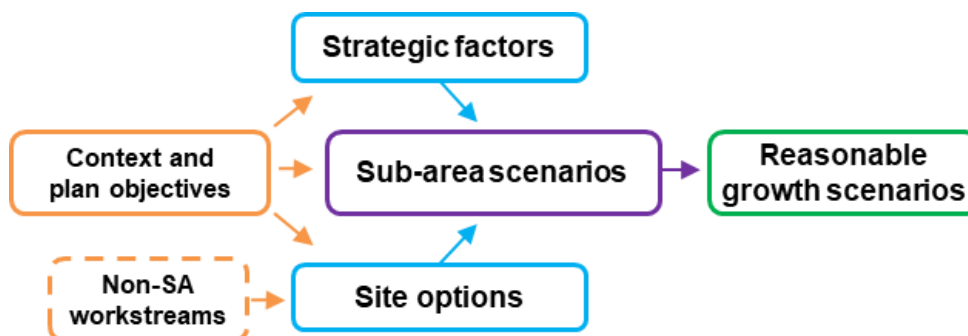
⁵ The current consultation document does present options under three DM policy headings (affordable housing, employment/skills and sustainable design/construction), but these are not considered to be reasonable alternatives detailed appraisal.

5. Defining growth scenarios

5.1. Introduction

- 5.1.1. The aim here is to discuss the process that led to the definition of reasonable growth scenarios in 2025. To reiterate, growth scenarios equate to **reasonable alternatives**.

Figure 5.1: A standard broad process to define growth scenarios



- 5.1.2. This process is described across the following sub-sections:

- **Section 5.2** – considers strategic factors ('top down').
- **Section 5.3** – considers individual site options ('bottom up').
- **Section 5.4** – draws matters together (top down / bottom up).
- **Section 5.5** – concludes on reasonable growth scenarios.

- 5.1.3. Also, with regards to the **context**, the key point to make is that key context is provided by plan-making stages over recent years, including two prior formal consultations.

A note on limitations

- 5.1.4. It is important to emphasise that this section does not aim to present an appraisal of reasonable alternatives. Rather, the aim is to describe the *process* that led to the *definition* of reasonable alternatives for appraisal. This has a bearing on the level of work that is proportionate, and it is important to note the legal requirement which is to present an "**outline of the reasons for selecting alternatives dealt with...**" [emphasis added]
- 5.1.5. It is also important to state that there is a tension between, on the one hand, wishing to undertake work to explore RA growth scenarios early in order to feed in early to plan-making whilst, on the other hand, wishing to undertake the work in the light of detailed evidence and understanding, which will inevitably accumulate right up until the point of finalising the plan for consultation. There are many 'non-SA' workstreams (including as reported in other published reports) that are entirely relevant to the task of defining RA growth scenarios, and these have fed in as far as possible, but there are invariably timing limitations.

5.2. Strategic factors

Introduction

- 5.2.1. The aim of this section is to explore strategic factors (issues and options) with a bearing on the definition of growth scenarios. Specifically, this section of the report explores:

- Quantum – how much development is needed (regardless of capacity)?
- Broad spatial strategy – broadly where is more/less suited to growth; also, what growth typologies are supported, e.g. large ('strategic') sites versus smaller sites?

Quantum

- 5.2.2. This section considers development needs in respect of housing and employment land in turn (N.B. there are no identified Gypsy and Traveller accommodation needs).
- 5.2.3. In each case, in addition to setting out understanding of objectively assessed need (NPPF para 11), the aim is to also explore *high level* arguments for the Local Plan providing for a quantum of growth either above or below objectively assessed need.

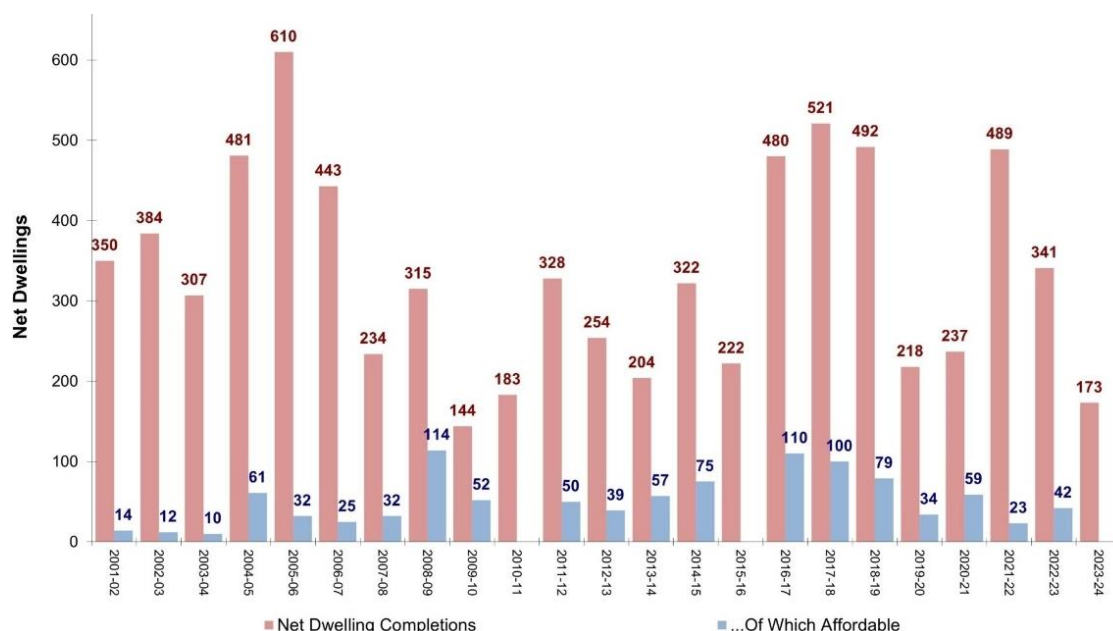
Housing

- 5.2.4. A central tenet of local plan-making is the need to **A)** objectively establish needs ('policy-off'); and then **B)** develop a response to those needs through the local plan ('policy-on'). The Governments Planning Practice Guidance (PPG) explains:
- "Housing need is an unconstrained assessment of the number of homes needed.... Assessing housing need is the first step in the process of deciding how many homes need to be planned for... undertaken separately from... establishing a housing requirement..."*
- 5.2.5. With regard to (A), the NPPF states that local housing need (LHN) should be established via an assessment "conducted using the standard method".
- 5.2.6. With regard to (B), most local authorities respond to LHN by setting a housing requirement that equates precisely to LHN. However, under certain circumstances it can be appropriate to set a housing requirement that departs from LHN.
- 5.2.7. For Southend the Government's standard methodology establishes an **LHN** figure of 1,405 dwellings per annum (dpa), or circa 24,000 homes over the plan period (2023 to 2040).
- 5.2.8. This is roughly four times the rate of development seen over the adopted Core Strategy period 2001 – 2021, and over the past three monitoring years the number of net new homes delivered has been 489, 341 and 173 homes respectively. Also, a large proportion of recent housing supply has come from the conversion of office blocks to residential flats, sometimes under permitted development, which is not an endless source of supply.
- 5.2.9. Recent delivery is an important consideration in and of itself, because the Council must only commit to a level of housing growth ('the housing requirement') that is deliverable, given that failure to deliver results in punitive measures (applications made under the presumption in favour of sustainable development, potentially resulting in problematic patterns of growth and, ultimately, poor outcomes). However, it is also an indication of the constraints to housing growth locally, which are wide-ranging and significant.
- 5.2.10. Constraints to growth locally can perhaps be summarised as: A) a very densely developed urban area with constraints to higher density development; B) very limited land outside the urban area and most of this land designated as Green Belt (and it is not readily apparent that much will be reclassified as grey belt, subject to further assessment); and C) strategic constraints to growth regardless of whether within or beyond the urban area, perhaps most notably in respect of road traffic.
- 5.2.11. In light of these three points, it is clear that there is a *high level* case for exploring (i.e. defining, appraising and consulting on) growth scenarios that would involve a housing requirement set below LHN such that the Local Plan generates unmet housing need.
- 5.2.12. This conclusion is also reached in the context of NPPF para 11b, which states that a housing requirement may be set below LHN where:
- "... the application of policies in this Framework that protect areas or assets of particular importance [see footnote 7] provides a strong reason for restricting... development; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."*
- 5.2.13. However, on the other hand, there is a clear high-level case for setting the housing requirement as high as possible in order to 'close the gap' to LHN.

5.2.14. This reflects a range of factors including:

- The extent of housing need(s) locally, including recognising that Southend's 'affordability ratio' (discussed [here](#)) is significantly higher than that for England as a whole (although it is in line with that for Essex as a whole) and has worsened at a faster rate, which could well be related to the supply of new homes not keeping pace with need/demand.
- The extent of affordable housing needs locally and recognising that affordable housing is mainly delivered by market-led housing schemes. See Figure 5.2.
- Understanding that meeting housing need is important not only in and of itself, but also due to highly significant secondary benefits, as has been discussed above.
- The fact that Southend sits within a constrained sub-region where unmet housing need is already an issue, with the reality being that there is little if any confidence regarding where, when or even if any unmet housing need generated would be provided for. See Box 5.1.
- The Government's planning reform agenda, including as reflected in the new NPPF, as part of which there is a new emphasis on providing for LHN in full wherever possible.

Figure 5.2: Market and affordable housing delivery in Southend 2001 to 2024



5.2.15. The final question is then whether there is a high-level case for exploring one or more growth scenarios involving a housing requirement set above LHN.

5.2.16. The theoretical possibility cannot be ruled out as unreasonable at this stage in the process, i.e. prior to giving consideration to spatial strategy and supply options (below). However, it is clear that the high-level case is very weak given the discussion above regarding constraints / barriers to high growth.

5.2.17. The context of the preceding two consultations also feeds in:

- Issues and Options (2019) – three RA growth scenarios were consulted upon at this stage all involving generation of unmet need, although the highest growth scenario aimed to provide for LHN in full, if ~5,000 homes (unmet need) could be provided in Rochford District under the Duty to Cooperate.
- Refining the Plan Options (2021) – the consultation document explained that the preceding consultation had found there to be a degree of support for engaging the Duty to Cooperate to provide for LHN in full, which in practice would mean major growth at Land North of Southend (LNOS) with a significant amount of homes delivered in Rochford District. The RA growth scenarios at this stage were very similar to those from 2019.

- 5.2.18. In short, at both previous stages the possibility of setting the housing requirement at LHN was ruled out as unreasonable, let alone a housing requirement above LHN. Consultation responses were mixed, as is invariably the case, but overall these consultations help to evidence a conclusion that a housing requirement set above LHN is unreasonable.
- 5.2.19. Finally, and for completeness, it is recognised that NPPF para 69 raises the possibility of a housing requirement above LHN on the basis of “growth ambitions linked to economic development or infrastructure investment” but this is not a significant factor for Southend.
- 5.2.20. In **conclusion**, there is a high level case for exploring growth scenarios involving a housing requirement set below LHN such that the Local Plan generates unmet need, but there is also a clear need to make every effort to minimise the gap to LHN, and indeed set the housing requirement at LHN if at all possible, given there is little if any confidence regarding unmet need from Southend being provided for elsewhere in a constrained sub-region (and, indeed, unmet need from elsewhere in the sub-region is already an issue, or at least a risk).

Box 5.1: Discussion of unmet need risk and capacity to provide for unmet need sub-regionally

Within the NPPF published in 2024, and under the Government’s planning reform agenda more broadly, there is a new emphasis on “effective cooperation” (within NPPF Section 3) particularly in respect of unmet need, which has been a major issue nationally over recent years, most notably across the south of England. However, dealing with unmet need as part of local plan-making is highly challenging, with the mechanism that has been in place to deal with the issue, namely the Duty to Cooperate, widely being considered to have failed.

The Government is taking forward a major process of Local Government Reorganisation (LGR) and Devolution (including a new tier of sub-regional Spatial Development Strategies) partly with a view to dealing with this issue. However, regardless of the challenges and a possible long term solution, there is need to make all reasonable efforts to deal with unmet need through local plan-making. The following text added to the NPPF under “effective cooperation” heading in 2024 is important:

“Plans come forward at different times, and there may be a degree of uncertainty about the future direction... In such circumstances... authorities... will need to come to an informed decision on the basis of available information, rather than waiting for a full set of evidence from other authorities.”

As discussed, there is a clear and obvious risk of the Southend Local Plan generating unmet need, and so it is important to give consideration to the possibility of all or any of this unmet need being provided for elsewhere within the sub-region (ideally as close as possible to Southend).

The City Council has been engaging with neighbouring authorities on a continuous basis regarding unmet need over the years, and this has not led to any agreement on capacity to accept unmet need from Southend. However, this process must remain ongoing, recognising that evidenced-based understanding of the issues / opportunities changes over time.

It is crucially important to achieve an accurate understanding of the potential for unmet need to be provided for elsewhere (in a suitable location), as far as possible. This is because this understanding must feed into any decision to generate unmet need, i.e. it is more difficult to justify generating unmet need where the risk or expectation is that it will not be provided for elsewhere.

Taking neighbouring local authorities in turn:

- Rochford District – a Spatial Options consultation was held in 2021 that explained the District remained open to all scenarios in respect of setting the housing requirement, namely: A) a housing requirement below LHN; B) a housing requirement at LHN; and C) a housing requirement above LHN “to drive local economic growth or address unmet need from elsewhere”. Alongside these three housing requirement options, the consultation document also presented a series of spatial strategy options, which notably included the possibility of large-scale growth at Land North of Southend (LNOS). Subsequent to the consultation a Feedback Report was published that notably explained that a South Essex Framework was “expected to be a non-statutory framework which demonstrates how various strategic and cross-boundary issues will be addressed across South Essex over the next 20-30 years”; however that has not progressed. The Local Plan was then due to be adopted by 2023 but, and in common with many other local plans, it has subsequently struggled to progress. Most recently, the District’s LHN increased by 75% under the new standard method published by the Government in December 2024 and, in turn, a reasonable assumption must be that the potential to make provision for unmet need from Southend has decreased considerably relative to the position in 2021.

- Castle Point Borough – an Issues and Options consultation was held in 2024 that explained the District was open to three scenarios in respect of setting the housing requirement, namely: A) ~50% of LHN; B) ~70% of LHN; and C) LHN. Subsequently a Consultation Report was published that notably explained that “most respondents” favoured (A). Also, and importantly, the Report explained that all of the South Essex authorities bar Thurrock and Chelmsford had stated no potential to provide for unmet need from Castle Point (Thurrock did not respond, whilst Chelmsford stated an expectation that Castle Point would provide for LHN in full). Subsequently, the key point to note is that LHN rose by 100% to 700 homes per annum in December 2024 and this is in the context of delivery averaging ~100 pa. Overall, there is a clear risk of unmet need.

Most recently (July 2024) a Regulation 19 version of the plan has been drafted and is due to be considered by Cabinet ([available here](#)). It proposes no Green Belt release and, in turn, proposes a housing requirement set far below LHN over the plan period, leading to significant unmet need. It is also noted that the housing requirement is heavily stepped and set precisely in line with supply.

- Basildon – a Draft Local Plan consultation was held in 2024 that committed to providing for LHN in full but did not include any discussion of unmet need or any consideration of possible higher growth. Subsequently LHN rose by around 20% to 1,287 homes per annum in December 2024, and recent delivery over the three years to 2024 has been only 302 homes pa. Overall, there is considered to be low risk of unmet need, but there is no clear evidence to inform a discussion of whether there might be capacity (or an opportunity) in respect of providing for unmet need.
- Thurrock – an Initial Proposals consultation was held in 2023 that seemingly committed to providing for LHN in full, but there was no discussion of unmet need or any consideration of possible higher growth. Subsequently LHN decreased to 1,071 homes per annum in Dec 2024, but recent delivery over the three years to 2024 has been only 340 homes pa. Overall, there is considered to be low risk of unmet need, but there is no clear evidence to inform a discussion of whether there might be capacity (or an opportunity) in respect of providing for unmet need.
- Brentwood – a Local Plan was adopted in 2022, and a review is yet to commence. The adopted housing requirement is 350 homes per annum, whilst the Borough's new LHN figure is 724 homes per annum, such that there is little reason to suggest that there might be capacity to provide for unmet need from Southend and, in any case, distance / poor links would be an issue.
- Chelmsford – is not seen as falling within the South Essex sub-region but is quite well connected to Southend via the A130. A final draft version of the Local Plan was published under Regulation 19 in 2025 proposing a housing requirement set at 83% of the December 2024 standard method LHN figure, with a view to being able to progress to submission and examination under the 2023 NPPF under the transitional arrangements set out in the 2024 NPPF. The plan document does not reference unmet need, but a Housing Topic Paper explains: *“The Local Plan’s evidence base, including the Integrated Impact Assessment (IIA), demonstrates that there is no capacity to meet unmet housing need from other local authority areas at this late stage of the plan preparation.”*
- Maldon – is not seen as falling within the South Essex sub-region and is a rural district not well linked to Southend. An Issues and Options consultation was held in 2022 and then the Council published a Questions and Answers document in 2023 that explained: *“The Council has to, as a requirement of the local plan, allocate enough land to accommodate its future growth requirements, in terms of housing, employment, retail etc.”* Subsequently LHN doubled to 569 homes per annum in Dec 2024 and recent delivery over the three years to 2024 has been 391 homes pa. On this basis there is little or no question of providing for unmet need from Southend.

Employment land

- 5.2.21. The Economic Development Needs Assessment (EDNA) explores employment growth scenarios, identifies a preferred scenario, considers existing and committed supply and then concludes on the “supply demand balance” to be addressed by the Local Plan.
- 5.2.22. With regards to ‘demand’, the EDNA’s Scenario 1: Baseline Scenario equates to 7,683 jobs between 2023 – 2040 and this is a reasonable minimum figure to plan for.
- 5.2.23. However, the EDNA suggests the Council should seek to accommodate requirements from higher growth scenarios, namely Scenario 2: Growth Scenario, which: *“balances the range of requirements and most importantly aligns with the Council’s Economic Development Strategies and the... ambitions across South Essex and... does not underestimate the economic growth potential that could be seen across Southend.”*
- 5.2.24. Finally, it is important to note that there are two further scenarios:
- Historic growth – this provides a negative figure, and is discounted by the EDNA, including on the following basis: *“... there have been significant losses across the City Council driven by loss in office floorspace. This is reflective to the fact that the area was historically an office centre and a public administration centre for the South Essex sub-region, but with a legacy of relatively dated office stock much of which was coming to an end of its ‘functional life’. Since PDRs were introduced in 2023, the redundant and underused office stock has gradually been removed from the market with much converted to residential.”*
 - Labour supply – produces a much higher jobs growth figure on the assumption of housing growth in line with standard method LHN (which has increased since the EDNA). However, the EDNA concludes that it: *“appears to overestimate the economic growth potential. This is further reinforced with the comparisons to... historic growth.”*

Figure 5.3: Two of the four jobs growth scenarios examined by the EDNA

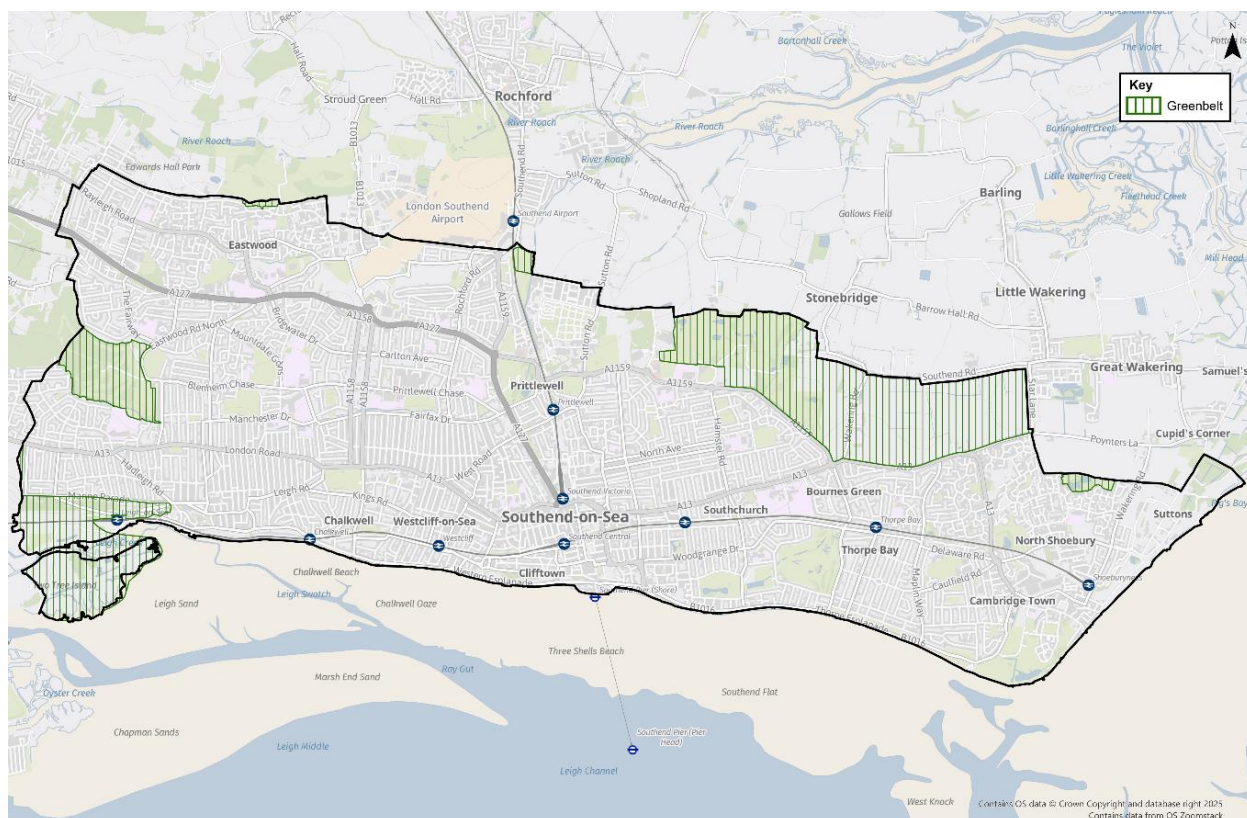
Type of Space /Use Class	Future Jobs Growth (Baseline Scenario) 2023 to 2040	Future Jobs Growth (Growth Scenario 2023 to 2040)	Difference between the Scenarios
Office E(g)(i)/(ii)	872	2,342	+1,470
Light Industrial E(g)(iii)	627	742	+115
General Industrial B2	-402	-402	0
Distribution B8	82	118	+36
Jobs in Other Sectors	6,504	10,245	+3,741
Employment Jobs	1,179	2,799	+1,620
Total Jobs (including all sectors of the economy)	7,683	13,045	+5,362

- 5.2.25. The next step is then to translate jobs growth demand into demand (or ‘need’) for employment land, with a key distinction between three different types of employment land.
- 5.2.26. Focusing on Scenario 1: Baseline, the conclusion is a need for 18.2 ha in total over the period 2020 – 2043 which breaks down as: land for offices – 6.2 ha; land for manufacturing – 8.3 ha; and land for warehousing / distribution – 3.6 ha. The total figure is 6.1 ha.
- 5.2.27. Moving on to supply, the EDNA seeks to establish existing supply from: A) extant permissions for employment floorspace; B) existing employment sites with capacity for new floorspace; and C) Southend Airport Business Park, which needs standalone consideration.
- 5.2.28. The conclusion is that ‘existing supply’ is more than sufficient to provide for jobs growth needs under the aforementioned ‘baseline’ scenario, but if the Local Plan were to take forward the EDNA’s preferred scenario the existing supply would be insufficient to meet demand such that the Local Plan should seek to allocate additional land. In particular:
- “Across the different uses, there is potentially an identified shortfall for office and light industrial space. This indicates that flexible allocations for E(g)/B2/B8 could help meet any future need for either office or light/general industrial or distribution uses. In appropriate circumstances, flexible allocations and permissions could be considered a potential solution to accommodate different types of needs that may arise... whilst managing uncertainty.”*

Conclusion on growth quanta

- 5.2.29. This section has considered housing needs and employment land needs in turn.⁶
- 5.2.30. With regards to housing, whilst every local plan must seek to set the housing requirement at LHN if at all possible, it is clear that in the case of Southend there is a high-level case for remaining open to growth scenarios that would see the housing requirement set below LHN such that the Local Plan generates unmet need. This is despite the fact there is little if any confidence regarding the potential for unmet need generated to be provided for elsewhere.
- 5.2.31. With regards to employment land, the EDNA identifies a minimum need figure (and, in turn, a minimum residual need figure after having accounted for existing supply) but is also clear that: *“the Council could proactively decide to accommodate the higher employment requirements or could desire to attract additional inward investment growth, which could in turn also drive greater economic growth, productivity, employment and tax receipts. On this basis, the Council should seek to accommodate the requirements that derive from higher growth scenarios... This could [reduce] out-commuting rates and provide increased employment choices for the City Council’s existing and new residents.”*
- 5.2.32. The question of growth quanta to reflect across the RA growth scenarios is returned to in Section 5.5, following consideration of supply issues, opportunities and options.
- 5.2.33. However, to end this section it is important to be clear that supply options are limited on account of: A) the limited undeveloped land free from clear constraints; and B) limited potential for high density development in parts of the urban area.
- 5.2.34. Figure 5.4 shows Green Belt land that potentially comes into contention to close the gap to LHN, but the parcels to the west are subject to clear constraints, such that attention focuses on the large parcel to the north.

Figure 5.4: Green Belt in Southend



⁶ N.B. this section has not included a section on Gypsy and Traveller accommodation needs because there is understood to be no need over the plan period on the basis of the Southend Gypsy and Traveller Accommodation Needs Assessment (2024). Nonetheless, this is a matter that is considered further below as part of appraisal work (Section 6).

Broad spatial strategy

- 5.2.35. The aim of this section is to explore 'broad spatial strategy' issues, opportunities and options, building upon key points already introduced above.
- 5.2.36. The focus is on housing and, whilst there are often wide-ranging broad strategy factors that must feed into local plan-making, for Southend the situation is relatively straightforward.
- 5.2.37. Specifically, there is a need to consider broad strategy in respect of:
- Maximising urban supply; and
 - Supply within the Green Belt to close the gap to LHN.

Maximising urban supply

- 5.2.38. This has been a key focus of work over recent years, given a recognition that it will likely not be possible to set the Local Plan housing requirement at LHN, as discussed above.
- 5.2.39. A starting point is Section 2.3 of the Refining the Plan Options (RPO) consultation document (2021). This presented a baseline 'Increasing Urban Capacity' scenario and then a higher growth 'Facilitating Urban Change' scenario that would boost supply by 2,250 homes via an additional emphasis on:
- Regeneration of Council owned housing estates (40 sites; 850 homes net)
 - Redevelopment of underused employment sites for housing (4 sites; 750 homes);
 - Development of two areas of agricultural land in the urban area (350 homes);
 - Targeted development of urban greenspace (3 sites; 300 homes).
- 5.2.40. It is also important to note that Part 3 of the consultation document ('Neighbourhoods') presented detailed information on all of these urban site / strategy options and sought views, including on the matter of development density (a key question for the urban area, in addition to the question of which sites to allocate).
- 5.2.41. Furthermore, an assessment proforma was presented for each urban site allocation option, presenting analysis with a view to informing consideration of the options, i.e. the question of whether to allocate the site (particularly relevant for the Facilitating Urban Change sites) plus the question of appropriate development (also use mix, as a final consideration).
- 5.2.42. Subsequently (2022-2025) detailed work to explore urban supply options (site selection, density and use mix) has been ongoing drawing upon consultation responses and technical workstreams (e.g. looking at design, infrastructure and development viability / deliverability), and in the context of an evolving policy context, which in short is one whereby the top-down pressure to maximise urban supply has intensified.
- 5.2.43. Section 5.4 presents further detail, but this is 'light touch' because there are not considered to be any headline / strategic choices at this current stage (in contrast to 2021). There is undoubtedly a need to 'maximise' urban supply, and the emerging preferred approach to doing so is now considered to be strongly justified, in light of several years' worth of detailed work and consultation (and wider engagement). That is not to say that the emerging preferred approach is a fait accompli – all proposals are open for appraisal and consultation at the current time – but there are ultimately not considered to be any 'reasonable alternatives' (RAs) to explore through SA, for two reasons:
- There are no urban 'omission sites', i.e. no sites that are available, achievable and free from clear and obvious constraints, but which are not supported for allocation on balance.
 - Whilst there are certain proposed urban allocations where the quantum of new homes remains open for discussion – given potential choices around development density, layout and use mix – these choices are at the margins, with little or nothing in the way of headline choices at this stage in the process that might helpfully be explored through RAs.

- 5.2.44. The emerging **preferred urban supply** figure is 8,300 homes. This is lower than the maximum urban supply figure from 2021,⁷ but it would represent a high growth strategy relative to recent delivery. Indeed, an average supply figure of 488 homes per annum from the urban area (8,300 / 17 years) would arguably even represent a 'step change' in delivery recognising delivery of just 173 homes in the most recent monitoring year.
- 5.2.45. It is very important that the Local Plan only commits to a level of urban supply that is deliverable, having accounted for the challenges and ultimately risks associated with urban supply (e.g. given complex landownerships and existing uses with a bearing on viability). This is because (as discussed), under-delivery against the committed housing requirement leads to punitive measures, as has been the experience locally over recent years.
- 5.2.46. The 8,300 homes urban supply figure breaks down as:
- 4,000 homes in Southend Central
 - 1,900 homes across other neighbourhoods (including 700 homes at Shoeburyness)
 - 2,400 homes from windfall ('a windfall assumption').
- 5.2.47. Also, it should be noted that almost half of this supply already has planning permission.

Supply within the Green Belt to close the gap to LHN

- 5.2.48. Having accounted for 8,300 homes urban supply there is a supply shortfall of *at least* 15,700 homes if LHN is to be provided for in full, i.e. if the housing requirement is to be set at LHN, such that the Local Plan does not export/generate unmet need.⁸
- 5.2.49. The first port of call, in terms of options to reduce the gap to LHN, is then **Fossetts Farm**, which is a cluster of four mostly greenfield sites adjacent to the north of the urban area (west of Garon Park) and is currently safeguarded for development as part of the existing Southend Development Plan. Two of the sites have planning permission (one is under construction but has faced delivery issues) and a third is a small site that is not in the Green Belt. The final site is the largest component (c.900 homes) and does remain partly in the Green Belt, but this is a remnant area of Green Belt that is separated from the wider Green Belt and so is judged poorly performing in Green Belt terms. This site for 900 homes (HEA264) is otherwise well-located in wide-ranging respects and its delivery can secure a comprehensive development in combination with the other three Fossetts Farm sites and, in turn, ensure development of a high quality 'infrastructure led' new community.
- 5.2.50. This discussion leads to a conclusion that supply from Fossetts Farm (1,200 homes in total) can reasonably be assumed, such that it can be taken forward as a 'constant' across the RA growth scenarios (as per urban supply). In short, this is 'reasonable' given strategic factors (a need to reduce the gap to LHN) in combination with local / site-specific factors, including recalling that the land is already safeguarded for development.
- 5.2.51. The emerging "Preferred Approach" can thus be summarised as:
- Urban supply (8,300 homes) plus
 - Fossetts Farm (1,200 homes)
- 5.2.52. This totals 9,500 homes, and results in a supply shortfall of at least 14,500 homes if the housing requirement is to be set at LHN.⁸
- 5.2.53. There is then only one avenue reasonably open to the Council in respect of reducing this shortfall, which is growth within the Green Belt at **Land North of Southend (LNOS)**.

⁷ The consultation document in 2021 proposed an urban supply figure of 12,850 homes but over a longer plan period (2019 to 2040).

⁸ This is an 'at least' shortfall figure for two reasons: 1) there is invariably a need to identify a total supply in excess of the housing requirement as a contingency for unforeseen delivery issues, i.e. to ensure the housing requirement is delivered in practice; and 2) there is a clear case for an extended plan period, e.g. by two years such that the LHN figure increases by 2,810 homes (1,405 x 2). This reflects the NPPF requirement for plan periods of 15 years from the point of plan adoption.

- 5.2.54. Options have been explored in detail since 2019 and continue to be explored, but there is now very strong evidence to suggest that any LNOS scheme must be comprehensive rather than partial or piecemeal, with a view to an infrastructure-led scheme that delivers on place-making, transport and wider objectives. Another key point to note is that any decision on releasing land from the Green Belt here would be subject to Green Belt Assessment.
- 5.2.55. The latest understanding is that a comprehensive scheme within Southend could deliver 4,000 – 5,000 homes, and so 4,500 homes is assumed. These could *potentially* be delivered in the plan period subject to phasing and the delivery of infrastructure.
- 5.2.56. This is the “Alternative Approach” that is a focus of the current consultation alongside the Preferred Approach. It would involve total supply of up to 14,000 homes resulting in a supply shortfall to LHN of at least 10,000 homes.⁸
- 5.2.57. A further key consideration is then the question of what happens at LNOS in **Rochford District**, which is for Rochford District Council to determine, but which must factor-in.
- 5.2.58. There are several alternative possibilities in regard to LNOS in Rochford, including:
- Baseline assumption – the Rochford Local Plan does not direct any growth to LNOS.
 - Alternative assumption 1 – the Rochford Local Plan supports additional limited growth at the western extent of LNOS (west of Sutton Road) noting possible access to the Airport Station via an upgraded Warners Bridge, subject to access upgrades. This assumption would be more in keeping with an urban extension to Southend.
 - Alternative assumption 2 – comprehensive growth within the Rochford part of LNOS. Precisely what form this would take is unknown, but the overall LNOS scheme would likely comprise both an urban extension to Southend and a number of garden villages. A concept plan prepared by the promoters dating from 2021 is available [here](#).

Conclusion on broad spatial strategy

- 5.2.59. The situation is very straightforward for Southend, in contrast to many other local plans:
- Urban area – there is a need to maximise supply within reason, and, in this light, there are not considered to be any ‘reasonable alternatives’ in SA terms at the current time. Options for maximising supply from urban allocations can continue to be explored and there is also the important matter of permissive development management policy in support of windfall.
 - Fossetts Farm – 1,200 homes can be assumed, as explained above.
 - LNOS – there is a key strategic choice to be made regarding whether or not to support strategic growth here (within the Green Belt) and any decision must clearly be made on the basis of clear assumptions regarding LNOS in Rochford District.

5.3. Site options

- 5.3.1. This section considers the individual site options that are the building blocks for growth scenarios. Specifically, the aim is to signpost to officer led workstreams that have assessed site options leading to a shortlist of site options to consider further in Section 5.4.

N.B. whilst assessing site options is often a key step in the process of defining RA growth scenarios, this is less so the case here. This is because, as discussed above: A) in the urban area there is considered to be very little if any choice with regards to which sites to allocate (with a more important question considered to be in respect of the policy approach for individual allocations, e.g. in terms of density); and B) outside of the urban area there are really only questions around LNOS (as introduced above and discussed further below).

- 5.3.2. The key workstream examining is the **Housing and Economic Land Availability Assessment (HELAA)**. HELAA is an iterative process for assessing known sites that are potentially available for development and for each one reaching a conclusion on whether the site is 'deliverable' (able to deliver within 5 years) or 'developable' (within the plan period) after having determined that the site is both:
- Available and achievable – meaning there is a reasonable prospect of development accounting for financial viability and assuming that the site will deliver on standard policy asks. This is not always clear cut, particularly where the land is currently in a profitable use and recognising the costs involved with seeking planning permission.
 - Suitable – the aim is to reach a high level conclusion in light of a basic set of criteria, recognising that 'HELAA suitable' does not necessarily translate as suitable for allocation.
- 5.3.3. An initial focus of the HELAA was sites submitted to the Council for consideration as potential local plan allocations, which primarily means sites submitted by landowners (looking back over a number of years) but also sites submitted by the Council with a focus on the Council's assets and regeneration objectives. However, there has also been a focus on proactively identifying potential sites (and broad locations; see NPPF para 72) for allocation, recognising the 'top down' pressure to maximise urban supply, as discussed. This has been a major undertaking, essentially because of a need to investigate land ownership and land-owner intentions before reaching a conclusion on whether the land could potentially be available for development in the plan period (to deliver new supply).
- 5.3.4. At this point it is important to state that predicting urban supply is far from an exact science and, in turn, urban supply must be identified on the basis of cautious assumptions with a view to avoiding a situation whereby unforeseen delivery issues result in the Council failing to deliver on its committed housing requirement and, in turn, facing punitive measures (as discussed). This is particularly important where the commitment is for the supply to come forward in the early / earlier years of the plan period, i.e. ahead of a local plan review.
- 5.3.5. With regards to **LNOS**, a key point to note is that it must be a focus of Green Belt Assessment (GBA) ahead of any decision to release land for development. As part of this, there is a need to account for the concept of grey belt introduced by the NPPF in 2024.
- 5.3.6. Another point to make here is that work to explore issues, opportunities and options in respect of LNOS has been inherently challenging, including politically, given it is a cross-border site (not only Southend / Rochford, but also Southend / Essex) and given the lack of strategic steer including given a shifting national policy context, for example in respect of how to treat the Green Belt as a constraint as part of local plan-making. It can be said that now is the time to remedy the situation, but it is also recognised that impending local government review (LGR) and devolution poses a challenge, plus there is the context of ongoing planning reform with a new National Planning Policy Framework (NPPF) imminent.
- 5.3.7. In **conclusion**, the HELAA identifies the urban sites for allocation and serves to confirm that outside the extent of the existing urban area the only options are Fossetts Farm and LNOS.

5.4. Top down meets bottom up

Introduction

- 5.4.1. Discussion has so far focused on A) ‘top down’ consideration of strategic factors (growth quantum and broad spatial strategy); and B) ‘bottom-up’ consideration of site options. The task now is to bring these factors together in order to identify reasonable combinations of site options that taken together could potentially deliver on strategic objectives.
- 5.4.2. This is typically a highly challenging aspect of local plan-making, such that it is important to break the task down by considering options/scenarios by sub-area. This is much less the case for Southend, as discussed, but it is nonetheless the case that exploring combinations of site options by sub-area (‘sub-area growth scenarios’) is a helpful exercise.

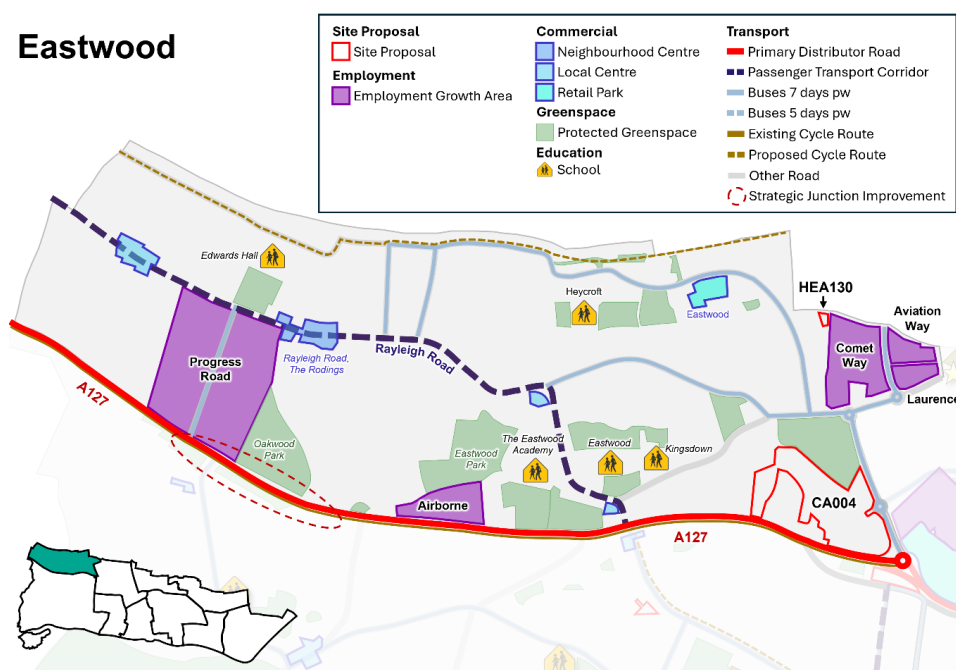
What sub-areas

- 5.4.3. As discussed, there are nine established neighbourhoods plus LNOS in the Green Belt.

Eastwood

- 5.4.4. Figure 5.5 is taken from the current plan document and shows two proposed allocations:
- CA004 (Nestuda Way) – is Council owned land farmland within the urban area. It is proposed for commercial development but is clearly sensitive on account of the adjacent airport and given the site is in direct alignment with the runway.
 - HEA130 (Land at Lundy Close) – is Council owned amenity greenspace and has planning permission for 9 homes.
- 5.4.5. Whilst there are no site options beyond these two sites, it will be important that ongoing consideration is given to whether one of both of the A-road corridors (particularly the A1015, recognising the distributor road role of the A127) could be identified as growth corridors, with a view to boosting urban supply alongside targeted investment in infrastructure. There may be potential for residential intensification along these routes (e.g. homes above shops) within the local/ neighbourhood centres that are found along parts of this route specifically, building on the ‘complete communities’ idea, focusing residential growth in sustainable locations with good access to retail/ commercial services, public transport.
- 5.4.6. In **conclusion**, there is just one reasonable growth scenario at the current time.

Figure 5.5: Key diagram for Eastwood



Leigh

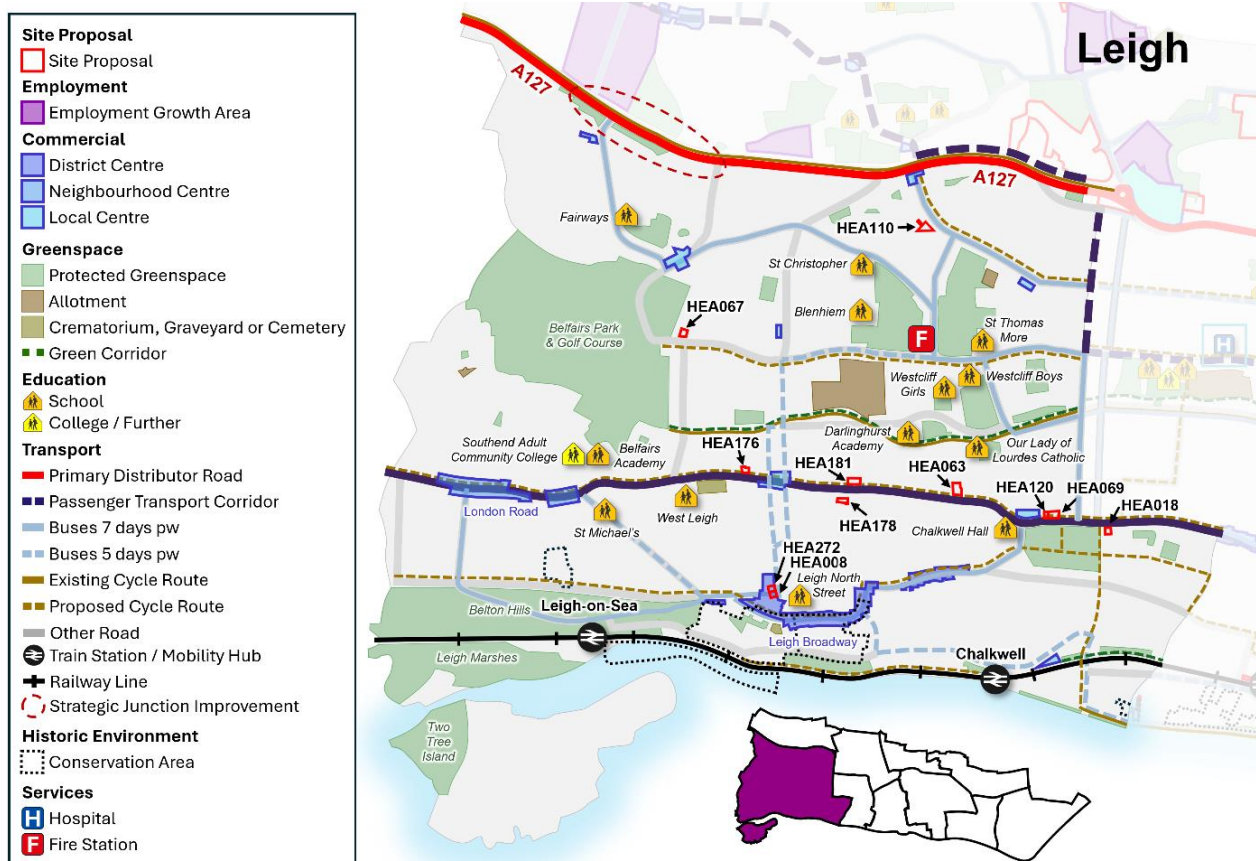
5.4.7. Figure 5.6 shows eleven proposed allocations although five of these have planning permission. Focusing on the non-permitted sites:

- HEA069 (Former Car Showroom, 831-837 London Road; **52 homes**) – proposed for a mixed use residential development with commercial ground floor providing active frontage.
- HEA018 (658 London Road; **25 homes**) – proposed for a mixed use residential development with commercial use at ground floor providing active frontage. The principle of development has been established through a previous planning permission.
- HEA178 (986-1006 London Road; **17 homes**) – proposed for a mixed use residential development with potential or commercial ground floor providing active frontage.
- HEA120 (843 London Road; **9 homes**) – proposed for a mixed use residential development with commercial use at ground floor providing an active frontage. The principle of development has been established through a previous planning permission.
- HEA110 (Vacant Land to the rear of 11-33 Juniper Road; **8 homes**) – proposed for residential, complemented by landscaping, green space and improved access.
- HEA272 (Former Police Station, Elm Road; **5 homes**) – proposed for a mixed use scheme with commercial/ community ground floor use providing active frontage, retaining locally listed façade with residential to rear and upper floors.

5.4.8. There is a clear cluster along the A13 London Road such that opportunities for the proposed allocations coming forward in a coordinated way should be explored, including mindful of any in-combination growth quantum thresholds that could unlock local benefits, for example an improved bus service or new strategic transport infrastructure.

5.4.9. In **conclusion**, there is just one reasonable growth scenario at the current time.

Figure 5.6: Key diagram for Leigh



Prittlewell

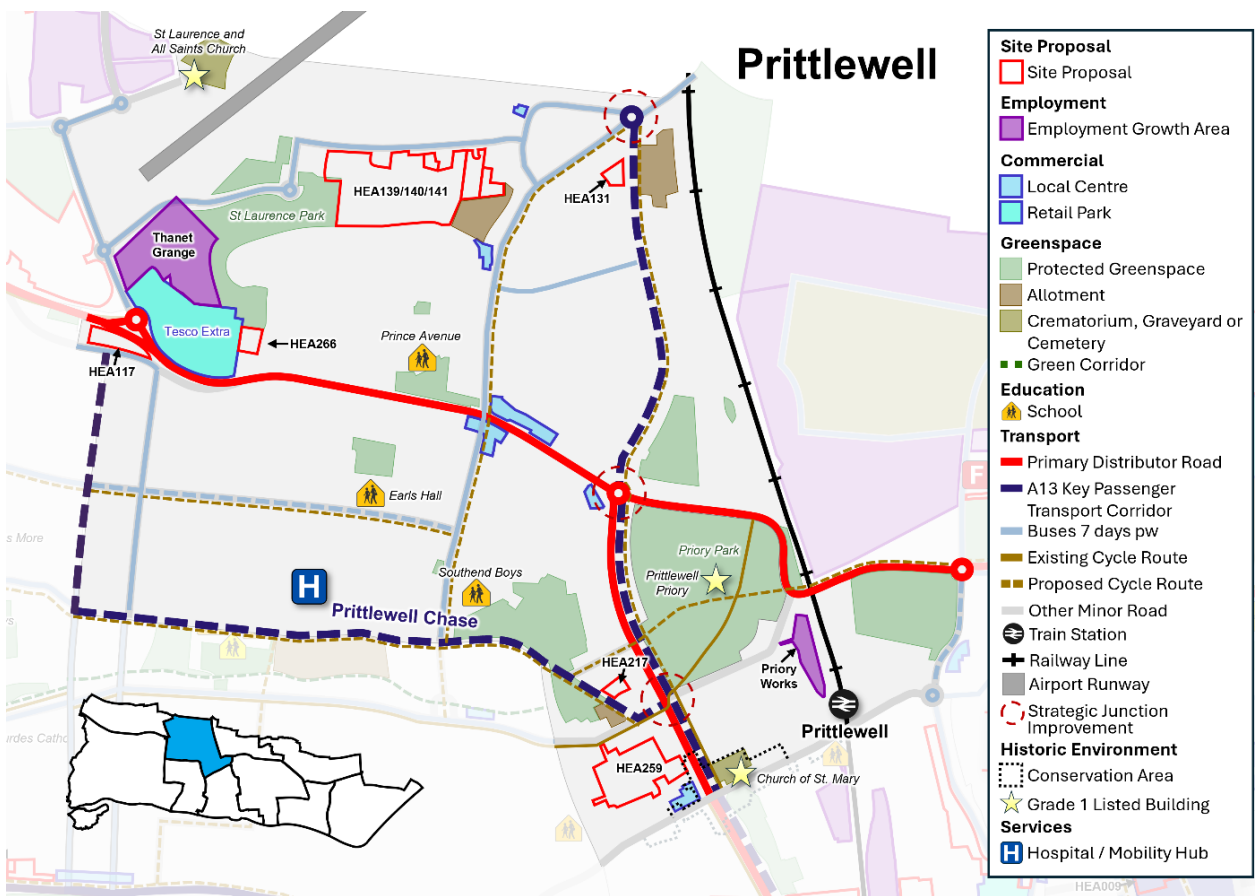
5.4.10. Figure 5.7 shows six proposed allocations, with just one having planning permission. Taking these in turn:

- HEA217 (Land at Prittlewell Chase, adjacent to Brook Meadows House; **31 homes**) – Residential development (potential for extra care/ assisted living/ key worker accommodation) complemented by landscaping.
- HEA117 (Land between Prince Avenue and A127 (former cattery); **29 homes**) – Residential development, complemented by landscaping and provision of green buffer between the rear of the site and Prince Avenue (A127).
- HEA131 (St Stephen's Church, Manners Way; **7 homes**) – Retain church and supporting community use, play area, and potential for complementary residential uses.
- HEA259 (Roots Hall Stadium; **unknown number of homes**) – renovation of Roots Hall Football Stadium to provide a modern community stadium with complementary food and drink uses, with potential for some enabling residential development.
- HEA139, HEA140A, HEA140B, HEA141 (South of Eastwoodbury Lane; **unknown number of homes**) – potential for new school as required and residential development alongside other uses. Part has planning permission. This is predominantly Council owned agricultural land in the urban area and is an important site for ongoing consideration.
- HEA266 (Prince Close; **unknown number of homes**) – potential redevelopment including residential, with landscaping, particularly to western boundary adjacent to commercial.

5.4.11. These bullet points serve to highlight the challenge in respect of predicting urban supply, as it is difficult to know precisely what will be delivered on urban sites ahead of detailed work including through the planning application process.

5.4.12. In **conclusion**, there is just one reasonable growth scenario at the current time.

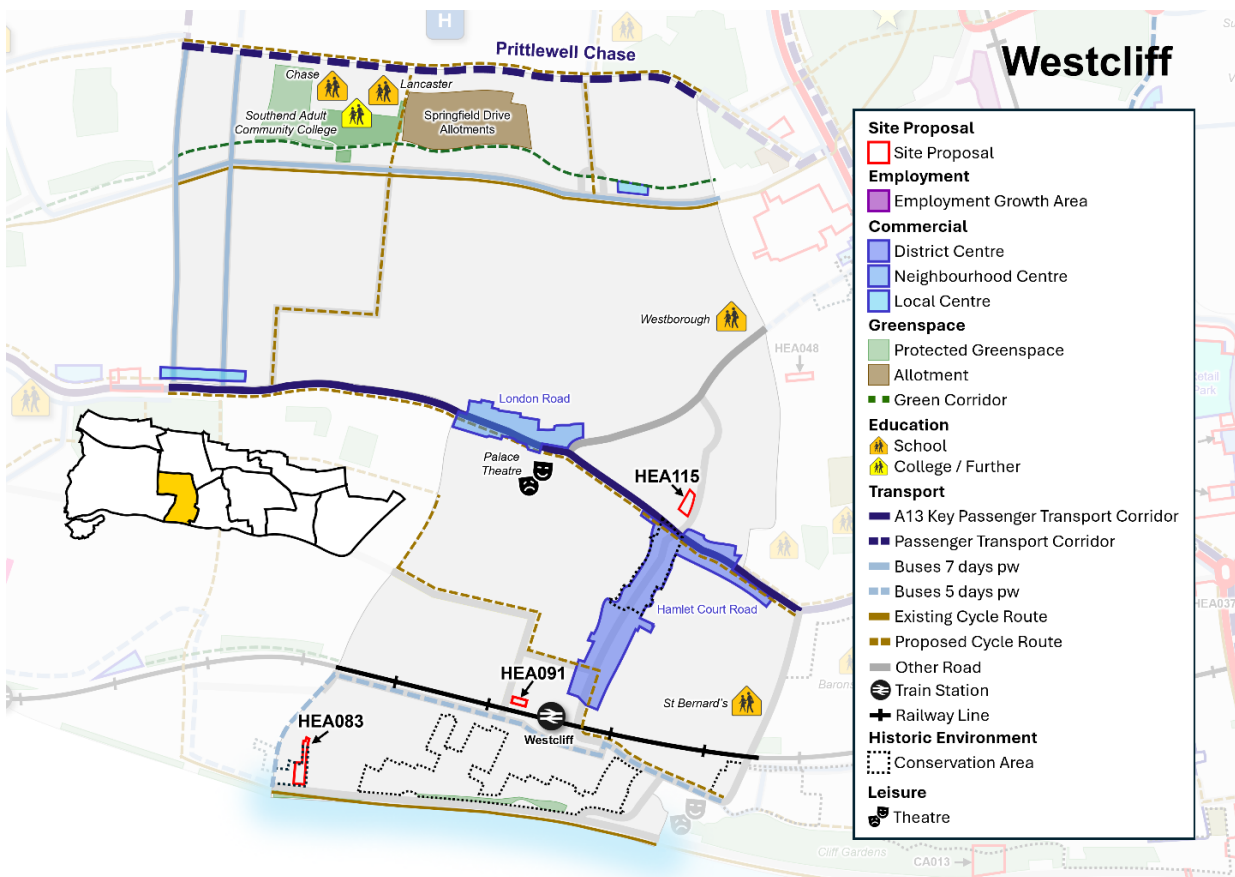
Figure 5.7: Key diagram for Prittlewell



Westcliff

- 5.4.13. Figure 5.8 shows three proposed allocations although one of these have planning permission. Focusing on the non-permitted sites:
- HEA091 (Land at Westcliff Station (adj Valkyrie Road); 12 homes) – potential for residential development with landscaping.
 - HEA115 (Part of Hamlet Court Road Car Park; 10 homes) – potential for residential development subject to operational requirements for public parking.
- 5.4.14. Both of the allocations are small but notable, including given proximity to a train station and/or a district centre, plus there is a degree of historic environment constraint.
- 5.4.15. Moving forward, a key consideration is that the A13 Key Passenger Transport Corridor runs through the neighbourhood and there may be opportunities for some intensification above commercial units (as has been witnessed through the implementation of recent planning permissions) and to enhance the transport offer further.
- 5.4.16. In **conclusion**, there is just one reasonable growth scenario at the current time.

Figure 5.8: Key diagram for Westcliff



Southend Central

- 5.4.17. Figure 5.9 shows a total of 29 site proposals although several have planning permission. This includes a key site for 1,760 homes (Better Queensway; HE096).
- 5.4.18. Focusing on the non-permitted sites, CA006 (Victoria Avenue West) stands out as a 'broad location' that could deliver **850 homes**. The proposal is for mixed use, residential led development with some supporting ground floor commercial uses green infrastructure.
- 5.4.19. Also, another important site is HEA006 (Central House, 8 Clifftown Road; **170 homes**), which is located in city centre primary shopping area, and where the proposal is mixed use residential development with commercial use providing active frontage to High Street and Clifftown Road. This site adjacent to locally listed building (Southend Central Station).
- 5.4.20. Of the remaining non-permitted sites, five are quite small sites that inherently give rise to limited concerns given a City Centre / Central Area location, with a primary consideration potentially being maximising supply given high levels of accessibility. Specifically, HEA037, HEA045, HEA082, HEA278 and HEA280 are allocated for **59 homes** in total. Also, it can be noted that for all five sites the principle of development has been established through one or more previous planning permission which, on the one hand generates confidence regarding suitability for redevelopment (all would involve redevelopment) but, on the other hand, highlights the challenge in respect of assuming urban supply with any certainty.
- 5.4.21. Certain of the remaining non-permitted sites are not proposed to include any new homes, namely HEA085, CA010, EA019, EA041, CA012 and CA013, and then remaining sites are supported for a mix of uses but with an **unknown number of homes** at the current time:
- HEA267 (Grainger Road) – is an existing employment area identified for cultural led regeneration, which could comprise mixed-use development with residential and live-work units, and potential for modern commercial floorspace to part of the site.
 - HEA269 (Central Station) – Continued used of railway station with potential for adjacent mixed use residential development with commercial uses.
 - CA005 (Victoria Avenue East) – a key mixed use regeneration area with a civic function and part of an existing allocation in the Southend Central Area Action Plan (2018).
 - CA009 (The Royals Shopping Centre) – another clearly complex site with many key design etc considerations in play.
 - CA011 London Road (Southend Central) – where there is support for increased building heights but a need for further work to confirm precisely what this should involve.
 - HEA042 (Former Gas Works, Eastern Esplanade) – proposed for retention of public parking with potential for mixed use development particularly to the north of the site, and with the principle of development established through previous planning permission. There is some flood risk.
- 5.4.22. Finally, the current plan document considers the City Centre as comprising a series of 'zones' – City Centre (North), City Centre (Central), and City Centre (South) – as shown in Figure 5.10. Each of these zones has its own role and identity, with the North area characterised as a 'Gateway', the Central area as an 'Educational hub' and South area as 'Shops to coast'. The City Centre Primary Shopping Area spans all three of the zones.
- 5.4.23. In **conclusion**, there is just one reasonable growth scenario at the current time, but at the next stage (Reg 19), and in light of further work, it could perhaps be possible to define a strategic choice regarding alternative supply options and potentially alternative visions.

Figure 5.9: Key diagram for Southend Central

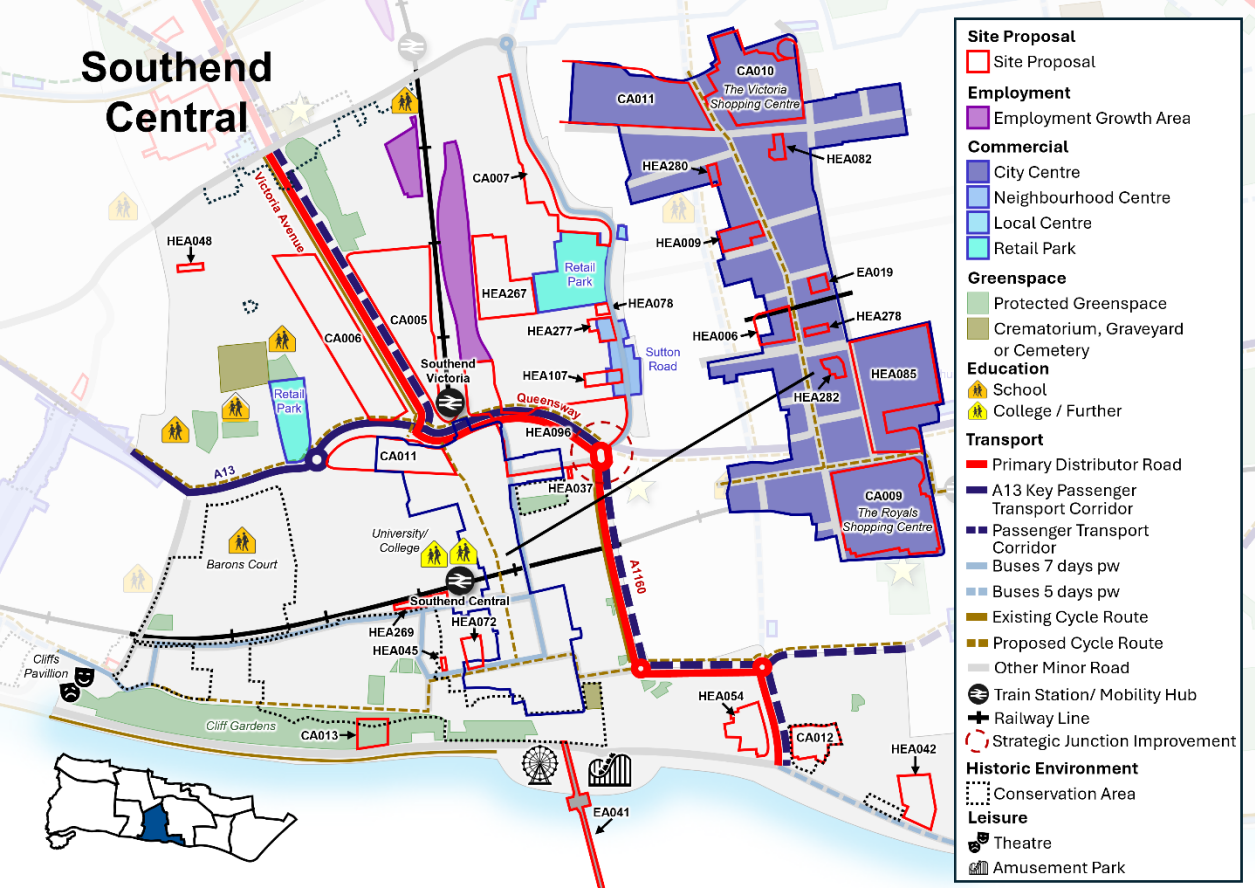
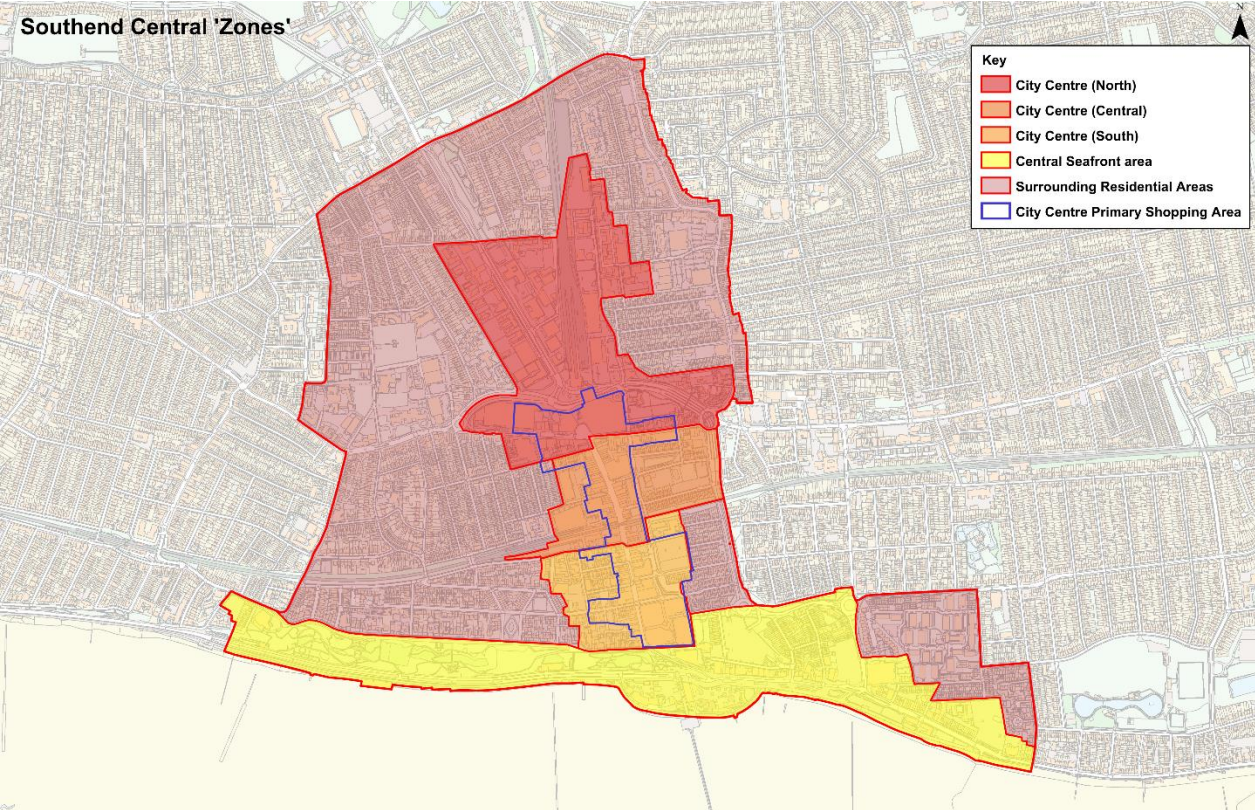


Figure 5.10: Defined zones within Southend Central



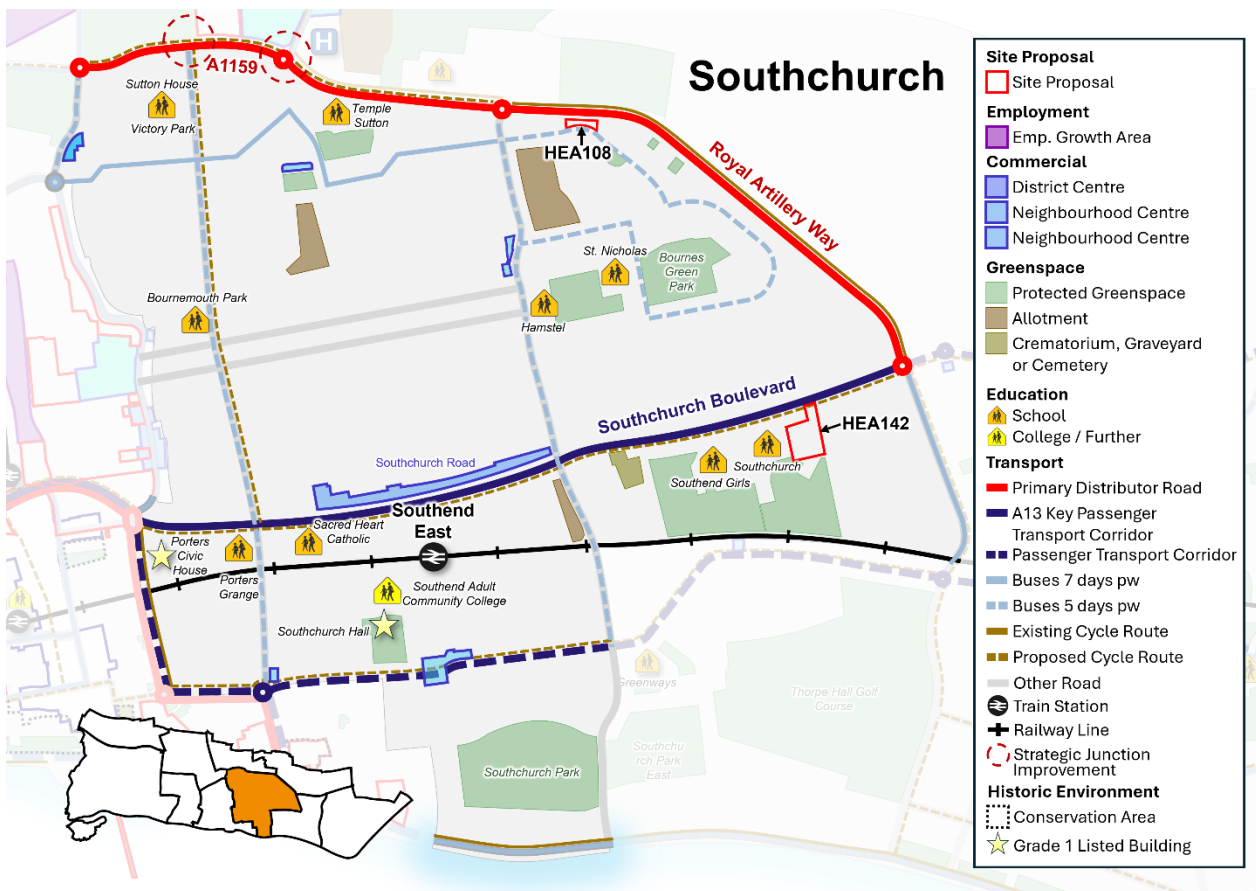
Southchurch

5.4.24. Figure 5.11 shows two proposed allocations, neither of which have planning permission:

- HEA142 (Former Futures College, Southchurch Boulevard; **56 homes**) – proposed for residential development complemented by landscaping.
- HEA108 (Vacant land at Archer Avenue; **10 homes**) – proposed for residential development complemented by landscaping, improved green space with retention of the memorial tree and other existing trees retained or suitably replaced.

5.4.25. In **conclusion**, there is just one reasonable growth scenario at the current time but again it will be important to consider whether further growth opportunities can be identified along transport corridors and at the key hubs of accessibility and/or connectivity, not least in the vicinity of Southend East Station and Southchurch Road Neighbourhood Centre.

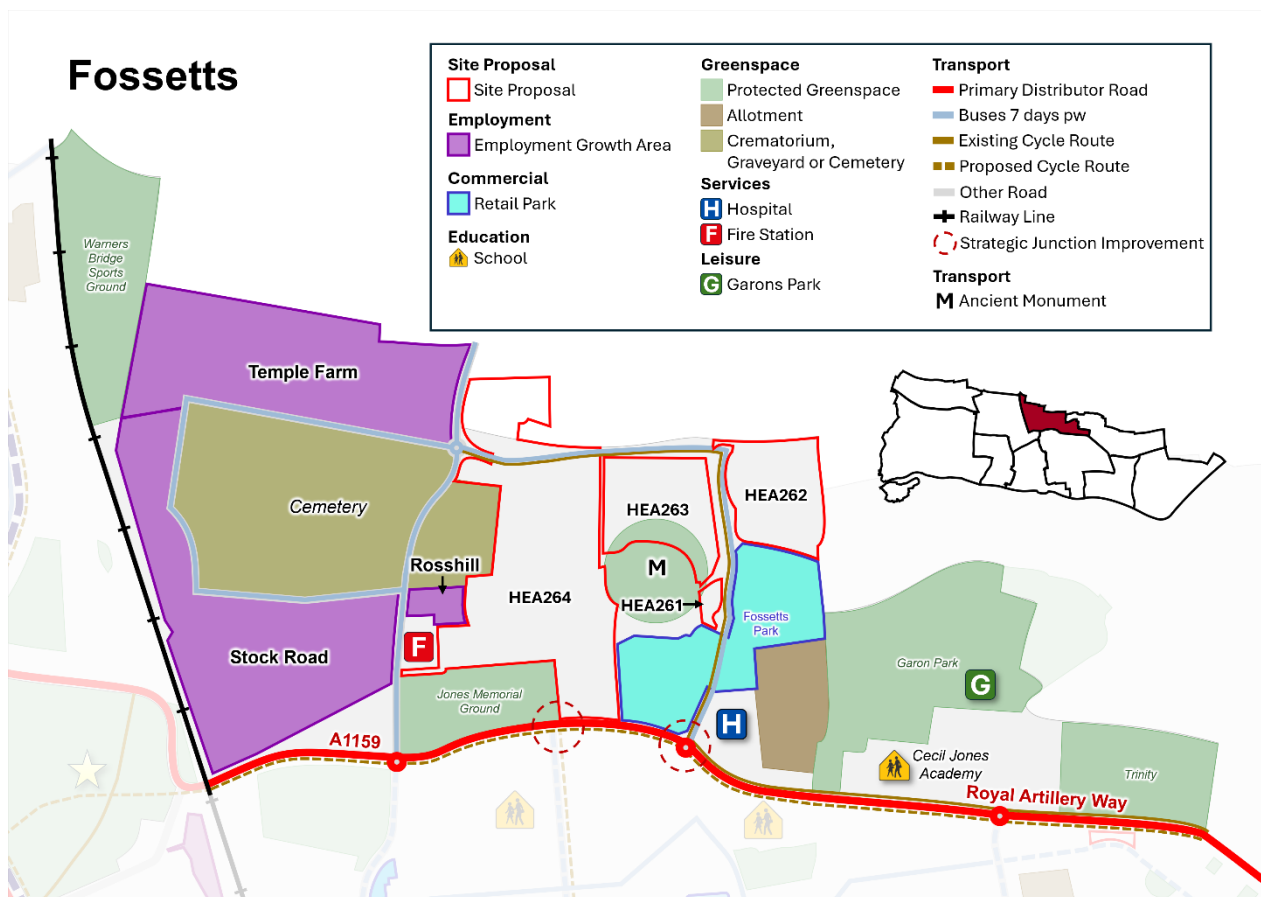
Figure 5.11: Key diagram for Southchurch



Fossetts

- 5.4.26. Figure 5.12 shows the four proposed allocations introduced above in Section 5.2.
- 5.4.27. As discussed in Section 5.2, this is a key growth area and can be taken forward to the RA growth scenarios as a constant given the strategic context (not least the need to close the gap to LHN), which is not to say that there is not a need for ongoing detailed scrutiny.
- 5.4.28. For completeness, the two sites with permission are HEA262 (221 homes) and HEA263 (131 homes) and then the non-permitted sites are:
- HEA264 (Fossetts Farm, Eastern Avenue; **900 homes**) –a mixed use residential-led development, including with a view to facilitating improvements/ modernisation of Roots Hall Football Stadium (site HEA259).
 - HEA261 Land West of Fossetts Way (near roundabout and Petrol Station); **46 homes**) – residential development with landscaping to ensure integration with surrounding area. Adjacent to Scheduled Monument, to be appropriately addressed as part of any scheme.
- 5.4.29. In **conclusion**, there is just one reasonable growth scenario at the current time.

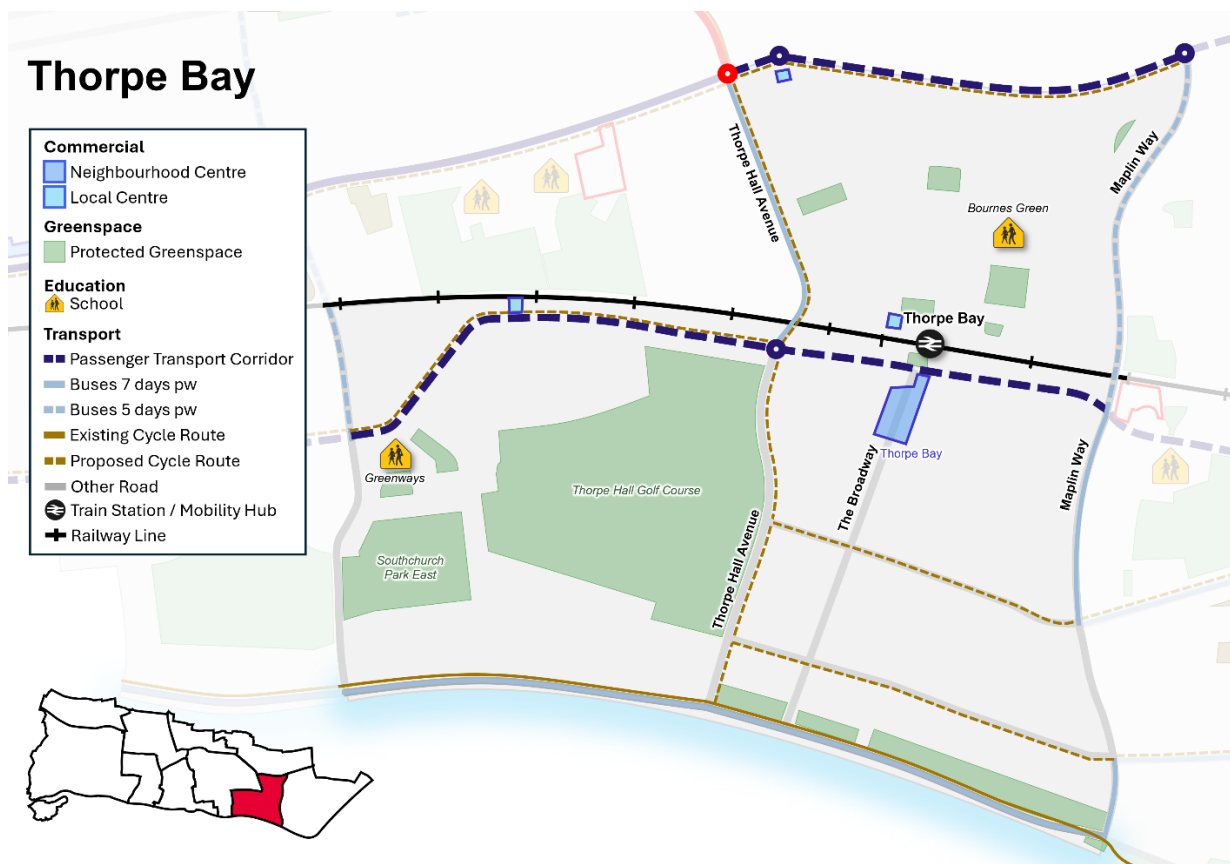
Figure 5.12: Key diagram for Fossetts



Thorpe Bay

- 5.4.30. Figure 5.13 shows that there are no proposed allocations in this area, which is a reflection of this being a relatively modern part of the City and no sites having been promoted.
- 5.4.31. Moving forward it will be important to give ongoing consideration to supply options, including in proximity to the train station and/or along one or both of the key transport corridors, and potentially with a view to delivering targeted benefits. For context:
- Thorpe Bay is characterised by large, low-density homes, green spaces, a strong tree canopy, and an attractive seafront. It is the lowest density established neighbourhood, with the second highest level of car ownership in the City.
 - The neighbourhood is bisected by the east-west railway line and is served by Thorpe Bay mainline railway station. To the south of the railway line and east of Thorpe Hall Avenue (notable for its green and tree lined, wide central reservation) the area is characterised by a strong grid pattern, drawn to generous proportions with homes in large plots.
 - Wide, tree lined streets are a feature, especially in the Burges Estate, which benefits from attractive gardens, tennis courts, bowling green and proximity to the seafront.
 - Southchurch Park to the west, provides quality public amenity space to the local area, and to the east is a new children's play area at Shoebury Common.
 - The golf course and land to the south lies within flood risk zones and Bournes Green roundabout/Thorpe Hall Avenue area is also prone to surface water flooding.
 - North of the railway line is Bournes Green, a planned interwar development built out after World War Two, the form of development largely influenced by the Garden City movement.
 - Beyond this is a large area of 1980s housing, focussed on Maplin Way North.
 - There is the context of proximity to Land North of Southend (discussed below).
- 5.4.32. In **conclusion**, there is just one reasonable growth scenario at the current time.

Figure 5.13: Key diagram for Thorpe Bay



Shoeburyness

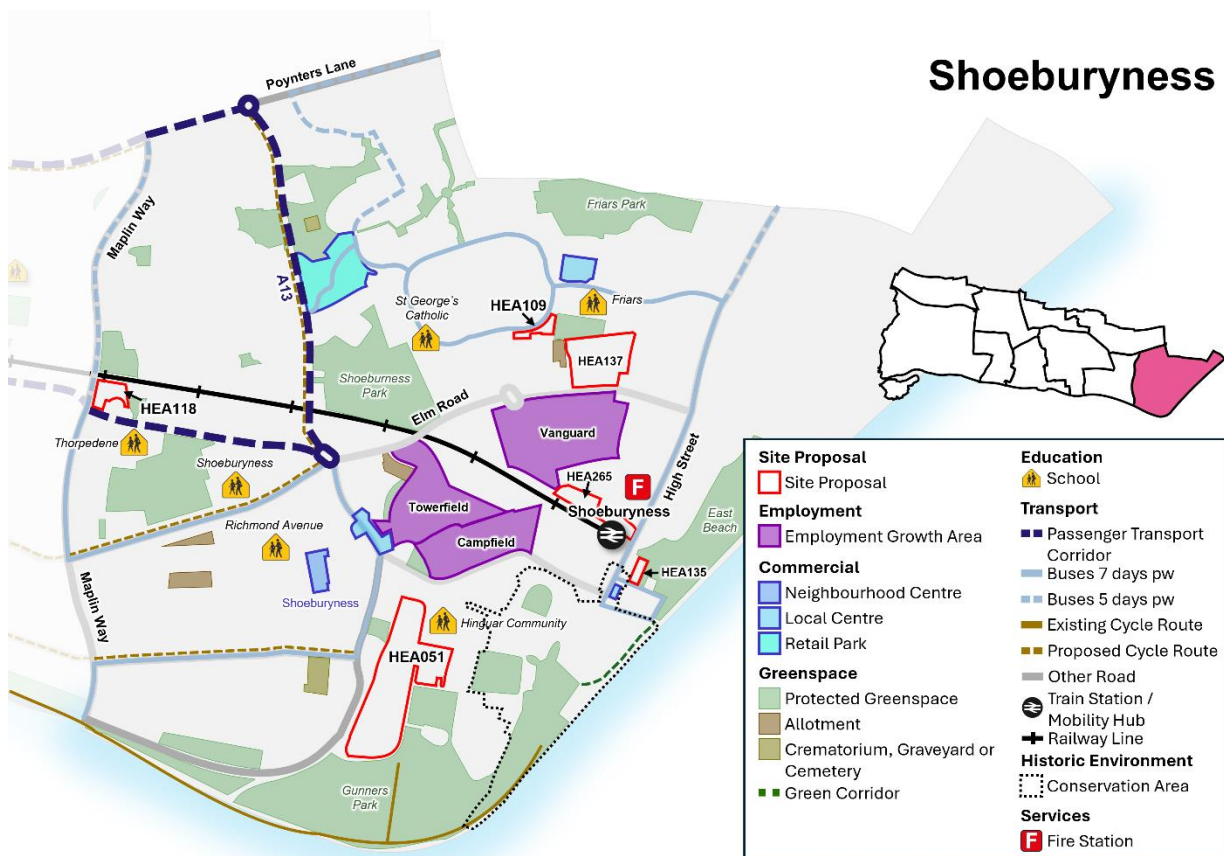
5.4.33. Figure 5.14 is taken from the current plan document and shows six proposed allocations although two of these have planning permission (one of which is affected by flood risk, as discussed further below in Section 6). Focusing on the non-permitted sites:

- HEA118 (Thorpedene, Delaware Road; **56 homes**) – proposed for residential development with potential for community uses as required.
- HEA135 (Land at George Street; **8 homes**) – residential development with enhanced, publicly accessible open green space, providing additional recreational space.
- HEA137 (Land at Elm Road; **unknown number of homes**) – potential for new school and residential development, with improved public open space. Development must satisfactorily remediate ground conditions / contamination.
- HEA265 (Terminal Close; **unknown number of homes**) – potential for mixed-use residential-led development and potential for small-scale, modern commercial floorspace (such as a small-scale convenience retail store) fronting Shoebury High Street. Release from former employment area designation. Adjacent to the train station.

5.4.34. Again, these bullet points serve to highlight the challenge of determining urban supply.

5.4.35. In **conclusion**, there is just one reasonable growth scenario at the current time.

Figure 5.14: Key diagram for Shoeburyness



Land North of Southend (LNOS) (within the Green Belt)

- 5.4.36. As discussed in Section 5.2, there is a crucially important strategic choice to make regarding whether or not to support development at LNOS, and that choice must be made on the basis of clear assumptions regarding what will happen, if anything, at LNOS within Rochford District. Specifically, the two scenarios are:
- Scenario 1 – no support for LNOS
 - Scenario 2 – Support for LNOS with 4,000 to 5,000 homes (such that 4,500 homes is assumed here) and a range of associated / complimentary uses in the plan period.
- 5.4.37. Figure 5.15 shows the individual HELAA sites within LNOS and it can be seen that there are a total of five individual site promotions, which does create a challenge, including as landowners must come together to agree a single vision / masterplan, and because there can be a need for 'equalisation' to ensure that landowners providing more land for non-housing uses (e.g. open space) are compensated by those providing less land, i.e. those able to deliver more homes on their land. However, this situation is not uncommon, and there are not known to be any particular concerns regarding landowner cooperation.
- 5.4.38. The separate site promotions also raises the possibility of supporting growth within just one part of LNOS within Southend. However, and as discussed in Section 5.2, there is clarity on the need for comprehensive growth at LNOS, with a view to delivering infrastructure and delivering on wider growth-related opportunities and avoiding the risk of piecemeal growth over time with opportunities missed to avoid issues and leverage maximum benefits.
- 5.4.39. The site promoters concept plan for a comprehensive cross-border scheme has been referenced above and is shown below as Figure 5.16. It is important to be very clear that this represents nothing more than the view of the site promoter at a point in time (2021), and that were LNOS to be taken forward there would be a need for much further detailed work.
- 5.4.40. It is also important to be very clear that the Southend Local Plan can only deal with that part of LNOS that falls within Southend, with it being for the Rochford Local Plan to give consideration to that part of LNOS that falls within Rochford District.
- 5.4.41. In **conclusion**, there are two reasonable growth scenarios for LNOS, plus it is important that ongoing consideration is given to what can be most safely assumed regarding cross-border growth. Finally, and to reiterate a point made in Section 5.2, there is clarity on the need for comprehensive growth at LNOS, such that there is no reasonable need to appraise and consult upon options whereby there is piecemeal growth within LNOS.

Figure 5.15: HELAA sites within LNOS

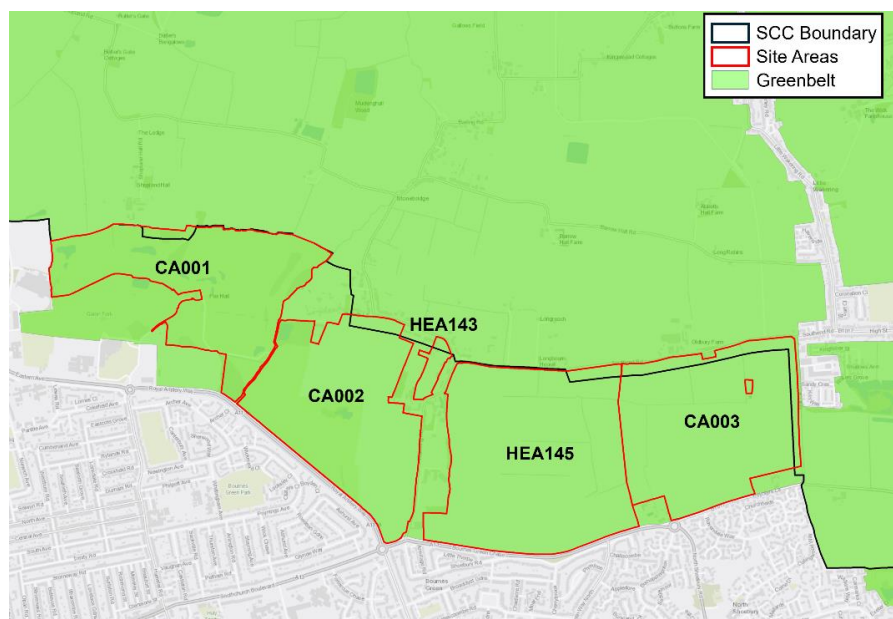
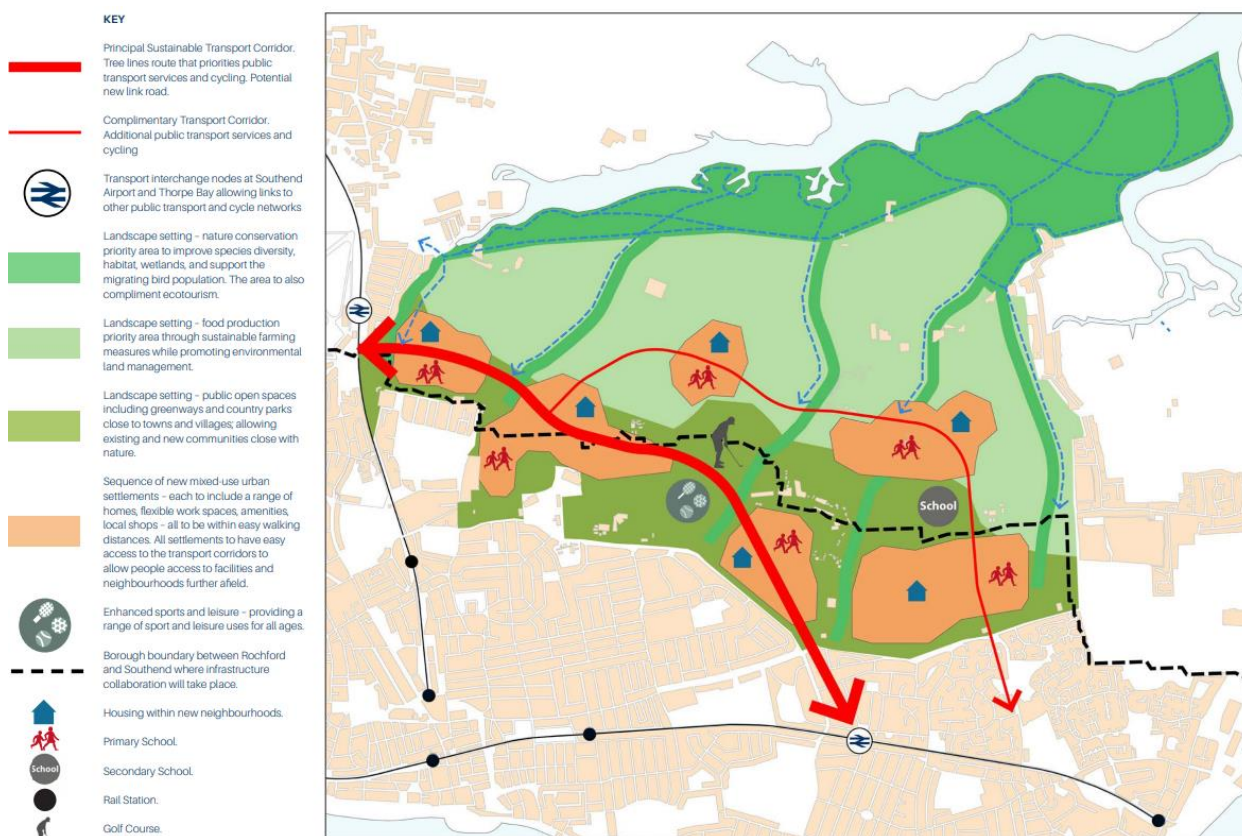


Figure 5.16: Site promoter's concept plan for a cross-border LNOS scheme (2021)



Conclusion on sub-area scenarios

- 5.4.42. The discussion in this section serves to confirm the conclusion tentatively already reached in Section 5.2, namely that there are currently no headline strategic choices in respect of growth strategy / sites / supply within the urban area nor at Fossetts Farm, but there is a key strategic choice in respect of whether or not to allocate LNOS within Southend (Green Belt) also mindful of the site promoters concept for a cross-border scheme.
- 5.4.43. However, in respect of urban supply this section has also served to highlight a need to:
- Firm-up supply including by deciding the number of homes that can be delivered at certain key sites after having accounted for non-housing uses, including community infrastructure. This is crucially important because, even if the Council is unable to set the housing requirement at LHN, there is a need to make every to close or reduce the gap to LHN.
 - Boost supply, if possible, to close the gap to LHN, with a need to scrutinise all sites in this regard and also site clusters. As part of this, there is a need focus on strategic transport hubs and corridors where there could be an opportunity to support higher density development and also areas with strong development viability in support of affordable housing and infrastructure, with develop viability varying considerably across the City.
- 5.4.44. Finally, this section has not served to highlight any headline strategic choices in respect of **employment land**. The emerging preferred approach is to deliver new supply sufficient to meet the 'baseline' need/demand described in Section 5.2, and whilst there is a strategic case for exploring options for further boosting supply, in practice it is not possible to identify any clear supply options. There are no clear employment land omission sites nor is it possible to pinpoint any further means of significantly boosting employment land supply over-and-above the emerging preferred approach, e.g. by adjusting use mix or density assumptions. As part of this, there are not known to be any strategic choices regarding the approach to intensification of the existing employment sites that are shown across the sub-area maps. Finally, at London Southend Airport and Airport Business Park Southend (located in Rochford District) the agreed approach is for half of the jobs growth associated expansion to be allocated to Southend and, once again, there is no strategic choice.

5.5. Reasonable growth scenarios

- 5.5.1. The final task in the process of defining growth scenarios (as introduced in Section 5.1) is to combine the sub-area-specific growth scenarios defined in Section 5.4 to form a single set of RA growth scenarios for the plan area (Southend) as a whole.
- 5.5.2. This is an entirely straightforward task, as the approach to growth / strategy / sites / supply can be held constant across all sub-areas bar LNOS, where there are two growth scenarios.
- 5.5.3. In summary, therefore, the two RA growth scenarios for appraisal and consultation at the current time are as follows:
- **Scenario 1** – the preferred approach (no Green Belt release) = 9,500 homes
 - **Scenario 2** – scenario (1) plus LNOS (Green Belt) within Southend = 14,000 homes
- 5.5.4. For context, it is important to recall that LHN is circa 24,000 homes and that the above figures relate to supply, whilst it is often seen as necessary or appropriate to set the housing requirement at figure below supply (e.g. 5%) as a contingency for delivery issues. As such, it can be suggested that under Scenario 1 unmet need would be *at least* 14,500 homes and under Scenario 2 unmet need would be *at least* 10,000 homes.
- 5.5.5. The two RA growth scenarios are shown across Figures 5.18 and 5.19 below, where:
- Figure 5.17 – is the Preferred Approach key diagram, with LNOS retained as Green Belt.
 - Figure 5.18 – additionally sees circa 4,500 home at LNOS within Southend (Green Belt).
- 5.5.6. Within regards to Scenario 1 (Figure 5.19), it is important to note that the link / distributor road shown passes through Rochford, such that its deliverability is uncertain at this time.
- 5.5.7. A final consideration is then in respect of the assumption that should be made regarding support for LNOS in Rochford District when appraising the option of LNOS in Southend. Three alternative assumptions are discussed above in Section 5.2, but for the purposes of appraisal it is considered appropriate to condense these into two, as follows:
- Baseline assumption – the Rochford Local Plan does not direct any growth to LNOS.
 - Alternative assumption – the Rochford Local Plan directs significant growth to LNOS.

Figure 5.17: Growth scenario 1 (no LNOS)

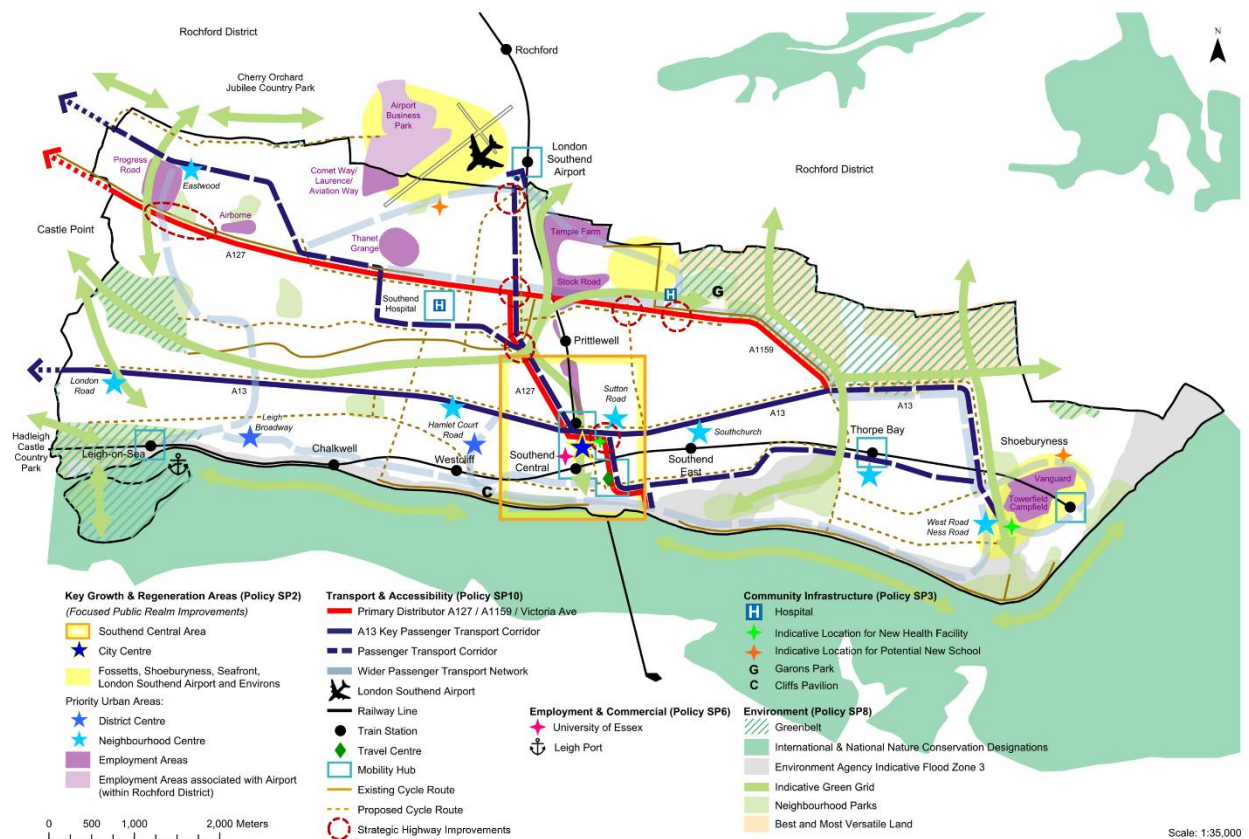
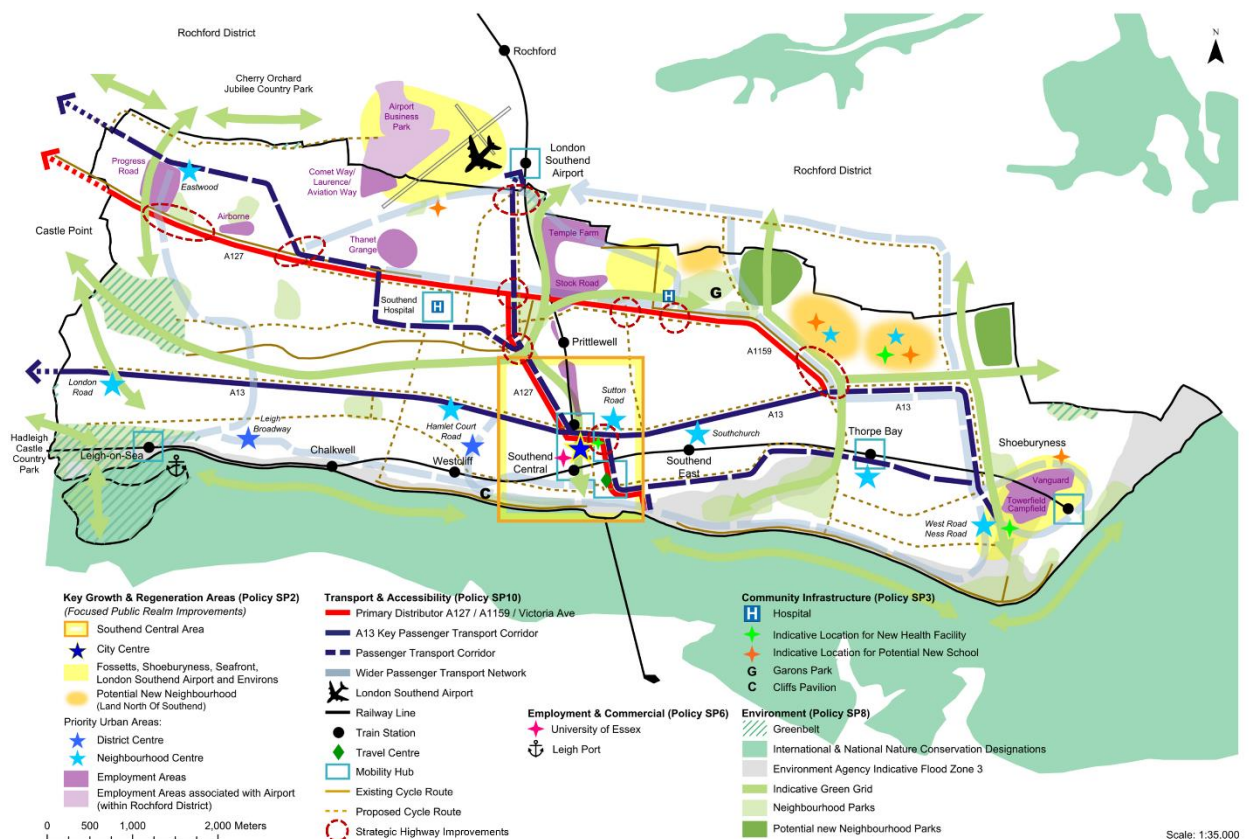


Figure 5.18: Growth scenario 2 (LNOS in Southend to deliver an additional c.4,500 homes)



6. Growth scenarios appraisal

6.1. Introduction

6.1.1. The aim here is to appraise the two reasonable alternative (RA) growth scenarios introduced above under the SA framework (Section 3). The scenarios are:

- **Scenario 1** – the preferred approach (no Green Belt release) = 9,500 homes
- **Scenario 2** – Scenario (1) plus LNOS (Green Belt) within Southend = c.14,000 homes
 - **Baseline assumption** – LNOS does not include land in Rochford District.
 - **Alternative assumption** – LNOS does include land in Rochford District.

Methodology

6.1.2. Under each sustainability topic the aim is to: **1)** rank the scenarios in order of performance (with a star indicating best performing); and then **2)** categorise the performance in terms of 'significant effects' using red / amber / light green / green:


- **Red** indicates a significant negative effect
- **Amber** indicates a negative effect of limited or uncertain significance
- **Light green** indicates a positive effect of limited or uncertain significance
- **Green** indicates a significant positive effect
- **No colour** indicates a neutral effect

6.1.3. The appraisal of Scenario 2 is undertaken on the basis of the 'baseline assumption' that LNOS within Rochford does not come forward. However, the opportunity is also taken to provide a view on whether the 'alternative assumption' (LNOS does include land in Rochford District) would improve or worsen the conclusion reached in respect of Scenario 2.

Assumptions

- 6.1.4. Firstly, and to reiterate, there is a need to make assumptions regarding Rochford Local Plan support for LNOS (within Rochford) when appraising the option of supporting LNOS (within Southend) through the Southend Local Plan. This is explained above.
- 6.1.5. Secondly, a key assumption is in respect of the future baseline (very important, as effects are predicted *on the baseline*), i.e. the situation without an adopted plan with a robust land supply. Specifically, the assumption is that there would be sub-optimal growth under the presumption in favour of sustainable development; however, there is no way of knowing precisely what this would involve.
- 6.1.6. Thirdly, a further key assumption is that, whilst higher growth in Southend (Scenario 2) would lead to negative environmental and socio-economic impacts locally, it would also serve to minimise unmet need across the sub-region potentially leading to positive effect at that scale. Conversely, under Scenario 1 the assumption must be that there would be additional pressure to provide for unmet needs across a constrained sub-region, despite this being clearly highly challenging given issues and constraints (as discussion in Box 5.1). On the one hand, it can be argued that unmet need may not be provided for (at least not in the short term, i.e. it could be provided for in the longer term following Local Government Review (LGR) or following a sub-regional Spatial Development Strategy (SDS) under Devolution), and this assumption feeds into a strongly negative view of generating unmet need from an 'homes' perspective (see appraisal below). However, on the other hand, under the current system every effort must be made to provide for unmet need under the Duty to Cooperate (there is a new emphasis on this within the December 2024 NPPF; see paragraph 28), and what will happen with local plan-making across South Essex ahead of an SDS cannot be foreseen. On balance it is appropriate to take a precautionary approach, when considering the possible negative implications of generating unmet need.

6.2. Accessibility (to community infrastructure)⁹

Scenario 1 Emerging preferred 9,500 homes	Scenario 2 + Land North of Southend 14,000 homes	Alternative assumption: If LNOS were assumed to extend into Rochford would the performance of Scenario 2 improve or worsen?
2	 1	Improve (significant)

- 6.2.1. The SA framework has been adjusted since 2021 to give stand-alone consideration to this issue because ‘infrastructure led’ growth has emerged as a key priority.
- 6.2.2. Beginning with Scenario 1, the overriding consideration is a concern regarding limited potential to deliver and fund/facilitate delivery of community infrastructure alongside homes, including acknowledging the development viability challenges associated with urban brownfield sites and the availability of land within the urban area to delivery new facilities. Matters are explored in further detail below, as part of the ‘Draft Plan’ appraisal, but a key challenge relates to delivering new school capacity.
- 6.2.3. Finally, with regards to Scenario 1, whilst it can be argued that a strongly urban focused strategy performs well because existing community infrastructure is located in the urban area, a counter argument is that unmet need would be generated that might have to be provided for elsewhere in South Essex and this could lead to pressure for growth in locations with poor accessibility credentials, e.g. small sites at villages.
- 6.2.4. With regards to Scenario 2, as a very large greenfield scheme (with economies of scale) there would be good potential to deliver community and green infrastructure alongside homes. Also, LNOS generally has good access to leisure-based community infrastructure at Garon Park. However, there are major risks and uncertainties given the potential costs involved with delivering major transport upgrades and connection through land in Rochford, particularly under the ‘baseline assumption’ of no growth at LNOS in Rochford District.
- 6.2.5. As for the alternative assumption of a comprehensive LNOS scheme, the site promoters have made a commitment to the delivery of a secondary school and a series of primary schools / neighbourhood hubs, but there are a range of uncertainties. The Local Plan’s Infrastructure Delivery Plan (IDP, 2025) also notably envisages the potential for significant health infrastructure benefits, namely: a new 700sqm primary healthcare facility and improvement / expansion of Southend Hospital under the Scenario 2 baseline assumption; and three new primary healthcare facilities and a possible new hospital under Scenario 2 alternative assumption (i.e. on the assumption of a comprehensive cross-border scheme).
- 6.2.6. Overall, there is support for Scenario 2 over Scenario 1, but there are major uncertainties such that it is not possible to conclude a positive effect on the baseline for Scenario 2. The performance of Scenario 2 is significantly enhanced under the alternative assumption regarding support for LNOS in Rochford DC (i.e. the assumption of support).

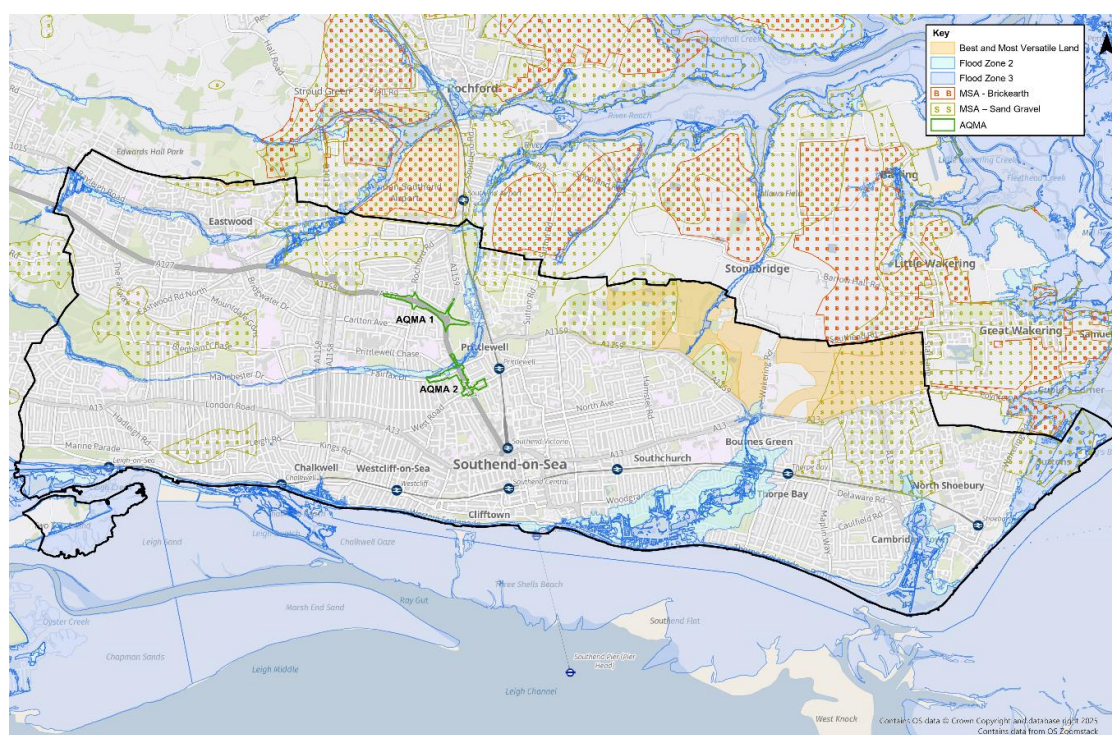
⁹ To reiterate methodology, under each sustainability topic (e.g. Accessibility to community infrastructure) the aim is to: 1) rank the scenarios in order of performance (with a star indicating best performing); and then 2) categorise the performance in terms of ‘significant effects’ using red / amber / light green / green, where: **red** indicates a significant negative effect; **amber** indicates a negative effect of limited or uncertain significance; **light green** indicates a positive effect of limited or uncertain significance; **green** indicates a significant positive effect; and **no colour** indicates a neutral effect.

6.3. Air quality


Scenario 1 Emerging preferred 9,500 homes	Scenario 2 + Land North of Southend 14,000 homes	Alternative assumption: If LNOS were assumed to extend into Rochford would the performance of Scenario 2 improve or worsen?
1	2	Improve

- 6.3.1. Air pollution caused by traffic is a significant issue locally, with two Air Quality Management Areas (AQMAs) designated along points of the road network where there are also sensitive receptors, e.g. homes. Transport is a focus of standalone discussion below, but here it is appropriate to introduce a key issue for Scenario 2, which is delivering a new road link to ensure that traffic generated by major growth at LNOS bypasses the highly problematic single carriageway section of the A1159 at Priory Park ahead of its junction with the A127, which is the eastern extent of one of the two AQMAs.
- 6.3.2. Specifically, to minimise traffic through this problematic stretch of road / the AQMA there would be a need for both: A) a link road from LNOS joining the A1159 Warners Bridge roundabout at the southeast edge of the Airport (challenging to deliver, as discussed); and B) junction and capacity improvements on and linking to the A127. There is greater uncertainty as to whether this could be delivered under the baseline assumption regarding LNOS in Rochford, including as the road would pass through Rochford District.
- 6.3.3. As for the alternative assumption, the potential to deliver new infrastructure would increase and there would also be greater potential to deliver and fund / facilitate the road link and public and active travel links to the city centre, potentially to include new and upgraded links through the existing urban area. However, there could still be overall increased road traffic passing the two AQMAs (this is unknown) and, furthermore, there is a need to note a third AQMA located along the A127 to the south of Rayleigh.
- 6.3.4. Overall, it is appropriate to flag a concern with Scenario 2. However, growth would happen over time and with much potential for mitigation, plus air quality is likely to improve over time assuming an ongoing switch-over to electric vehicles.

Figure 6.1: AQMAs and select other constraints across Southend



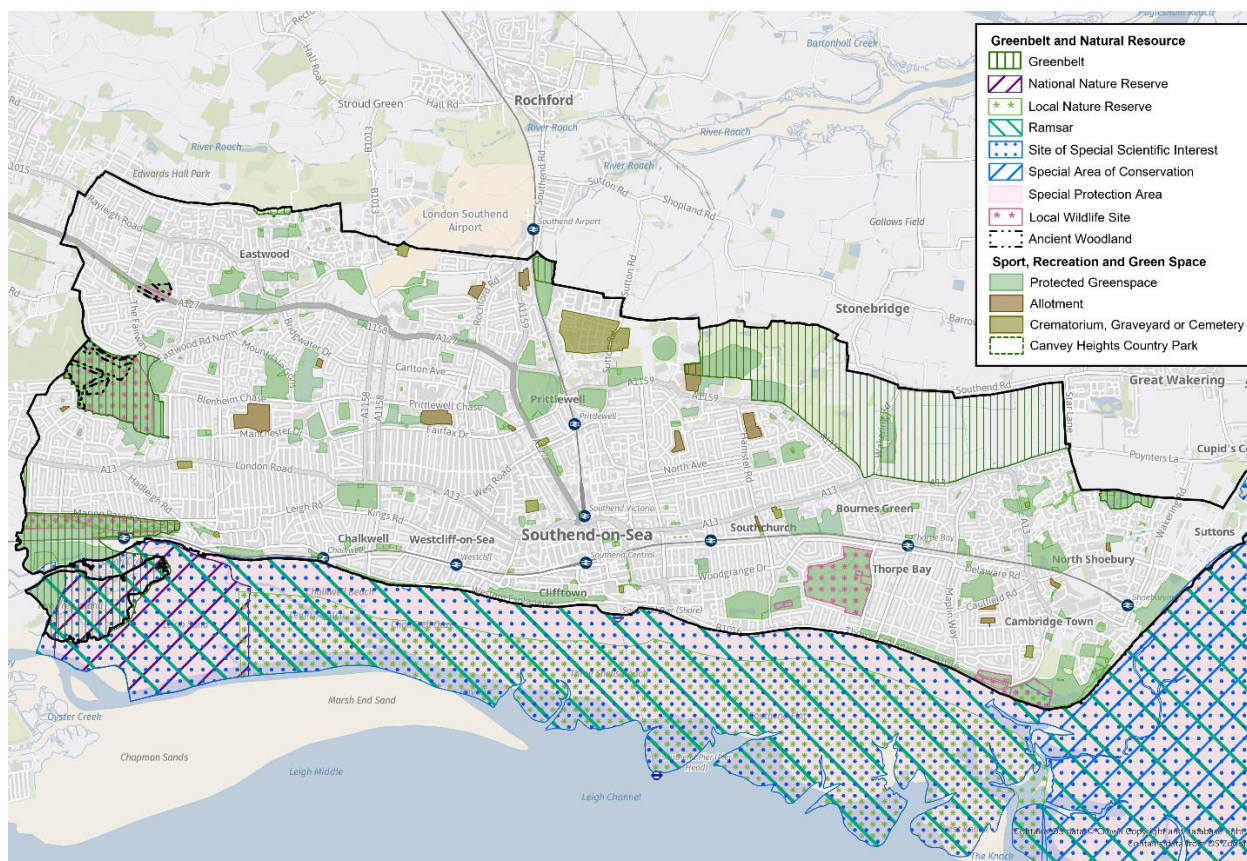
6.4. Biodiversity

Scenario 1 Emerging preferred 9,500 homes	Scenario 2 + Land North of Southend 14,000 homes	Alternative assumption: If LNOS were assumed to extend into Rochford would the performance of Scenario 2 improve or worsen?
2	 1	Improve

- 6.4.1. International, national and local biodiversity designations are a key constraint to growth locally (see Figure 6.2). Whilst there would be a wider range of biodiversity impacts under Scenario 2, at LNOS there would be good potential to deliver measures aimed at minimising / mitigating impacts and realising opportunities, both through onsite green and blue infrastructure and potentially through strategically targeted offsite interventions.
- 6.4.2. Also, and importantly, LNOS is considered (subject to further work) to be subject to *relatively* limited biodiversity constraint in the sub-regional context, which is an important consideration recognising that the additional unmet need generated under Scenario 1 could well have to be provided for elsewhere within a constrained sub-region (e.g. locations closer to the Essex Estuaries Special Area of Conservation, SAC) and/or across numerous small greenfield schemes with less potential to deliver mitigation and enhancement measures.
- 6.4.3. As for the alternative assumption regarding Rochford growth, it is possible to envisage greater potential to deliver strategic green and blue infrastructure benefits as part of a comprehensive LNOS scheme that crosses over into Rochford District.
- 6.4.4. The following bullets consider the related matters of greenspace (see Figure 6.2) and Suitable Alternative Natural Greenspace (SANG) to mitigate the recreational impacts of housing growth on the internationally designated Essex Estuaries:¹⁰
- The current Local Plan Infrastructure Delivery Plan (IDP) identifies the need for considerable new greenspace under Scenario 1, and the potential to deliver this is currently uncertain. Also, there are uncertainties around SANG, recognising that whilst the current Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) is currently less focused on SANG than some other mitigation strategies nationally, the possibility of an adjusted strategy more focused on SANG cannot be ruled out, given the scale of housing growth now anticipated across the sub-region.
 - Under Scenario 2, LNOS would likely be well-placed to deliver SANG, with the IDP suggesting that under the baseline assumption (growth in Southend only) LNOS could deliver significant parks etc of around 15 ha, and around 31 hectares of semi-natural greenspace” whilst under the alternative assumption (full cross-border scheme) it could deliver park etc of around 33 ha, and around 68 ha of semi-natural greenspace.
- 6.4.5. Overall, there is support for Scenario 2 over Scenario 1, and the performance of Scenario 2 is enhanced under the alternative assumption regarding support for LNOS in Rochford DC. However, overall neutral effects are predicted for both Scenarios 1 and 2.

¹⁰ SANG is large-scale accessible greenspace that meets strict criteria set by Natural England.

Figure 6.2: Biodiversity and open space designations (also showing Green Belt)



6.5. Climate change adaptation

Scenario 1 Emerging preferred 9,500 homes	Scenario 2 + Land North of Southend 14,000 homes	Alternative assumption: If LNOS were assumed to extend into Rochford would the performance of Scenario 2 improve or worsen?
=	=	Improve


- 6.5.1. Flood risk is a key consideration here, and there are sensitivities within the urban area, notably relating to coastal and fluvial flood risk (see Figure 6.1) but also relating to some significant surface water flood channels.
- 6.5.2. Pressure for urban intensification can lead to tensions with flood risk objectives (e.g. pressure to intensify sites that have historically been seen as appropriate for a low/lower intensity use mindful of flood risk) but concerns in this regard are thought to be limited under Scenario 1 (subject to a Strategic Flood Risk Assessment, SFRA).
- 6.5.3. As for Scenario 2, there is no clear assumption that support for LNOS would enable a lower growth strategy in the urban area (e.g. reducing pressure to intensify sites where there is an element of flood risk), but there could be some flexibility at the margins.
- 6.5.4. As for the LNOS site itself, the area is overall subject to limited flood risk, and areas of flood risk would be integrated as part of a masterplanned network of green / blue infrastructure. Given that this is the case and given an assumption regarding the potential to deliver high quality Sustainable Drainage Systems (the geology can have a bearing, but there are not known to be any issues/constraints), there is no reason to suggest any concerns regarding LNOS worsening downstream flood risk within the existing urban area. Also, strategic green / blue infrastructure could assist with mitigating the urban heat island effect and ensuring a new community that is resilient to future heatwaves linked to climate change.

6.6. Climate change mitigation

Scenario 1 Emerging preferred 9,500 homes	Scenario 2 + Land North of Southend 14,000 homes	Alternative assumption: If LNOS were assumed to extend into Rochford would the performance of Scenario 2 improve or worsen?
=	=	Improve

- 6.6.1. This is clearly a priority issue, and there is an important distinction between built environment and transport emissions. The former warrants being a particular focus of attention under this topic heading (given transport is a separate topic) such that there is a case for supporting comprehensive growth at LNOS, which could be well placed to deliver 'net zero development' given *relatively* strong development viability credentials (after having accounted for the cost of major new infrastructure). With regards to the urban focused strategy under Scenario 1, whilst this is clearly strongly supported from a transport decarbonisation perspective, development viability will be a barrier to built environment decarbonisation given competing priorities including affordable housing and infrastructure delivery (N.B. there is also a wider discussion around the merits of high density versus lower density living from a built environment decarbonisation perspective).
- 6.6.2. Under a baseline assumption for LNOS (i.e. an assumption of no growth in Rochford District) it could well be that infrastructure delivery challenges lead to very little in the way of viability headroom to support ambitious net zero measures.
- 6.6.3. With regards to significant effects, at this stage 'moderate or uncertain' negative effects are predicted across the scenarios on the basis that achieving the required trajectory to net zero is highly challenging, such that there is a clear case for placing the realisation of built environment decarbonisation opportunities as a central pillar of strategy / site selection. See further discussion below as part of the appraisal of the Draft Local Plan as a whole.

6.7. Communities

Scenario 1 Emerging preferred 9,500 homes	Scenario 2 + Land North of Southend 14,000 homes	Alternative assumption: If LNOS were assumed to extend into Rochford would the performance of Scenario 2 improve or worsen?
	2	Improve

- 6.7.1. The aim here is to capture wide-ranging communities issues/opportunities beyond those relating to accessibility to community infrastructure (discussed above).
- 6.7.2. With regards to the existing Southend community, it is acknowledged that there are concerns regarding LNOS, perhaps most notably on the grounds of potential traffic congestion and at this stage, it is not possible to conclude that concerns are over-stated (ahead of further detailed work), particularly under a baseline assumption regarding growth in Rochford District.
- 6.7.3. However, under the alternative assumption, which would mean a comprehensively masterplanned cross-border scheme, there would be the potential to deliver a high quality infrastructure-led new community at LNOS, to include a mix of land-uses including a high proportion of greenspace; an opportunity that is rare if not unique in the sub-region.
- 6.7.4. Finally, there is a need to recognise that a LNOS scheme allocated through the Southend Local Plan only would risk a less than comprehensive scheme, in that additional growth could 'bolt on' within Rochford over time, leading to opportunities missed in terms of masterplanning and leveraging funding for community / public benefit.

- 6.7.5. With regards to significant effects, on the one hand it might be anticipated that a strongly urban focused strategy will be supported locally because the effect will be to minimise pressure on greenfield land. Also, regeneration of the city centre is clearly a local priority. However, on the other hand, there are a range of community-related issues and opportunities to work through prior to plan finalisation, including noting the number of proposed allocations where development capacity, use mix etc remains uncertain.
- 6.7.6. Overall, it is difficult to reach a conclusion but, on balance, a 'moderate or uncertain' positive effect is predicted for Scenario 1. Regardless of the conclusion at the current stage, what is of great importance is accounting for responses received through the current consultation with a view to concluding a 'significant positive' next stage (Regulation 19).

6.8. Economy and employment

Scenario 1 Emerging preferred 9,500 homes	Scenario 2 + Land North of Southend 14,000 homes	Alternative assumption: If LNOS were assumed to extend into Rochford would the performance of Scenario 2 improve or worsen?
=	=	No effect

- 6.8.1. Under Scenario 1 there would be the potential to deliver on minimum employment land need figure identified within the Economic Development Needs Assessment (2023), primarily through the redevelopment / refurbishment and intensification of existing employment areas, plus jobs growth associated with expansion of Southend Airport Business Park (in Rochford District) where half is allocated to Southend. However, and as discussed in Section 5.2, there is a case for delivering additional employment land.
- 6.8.2. Under Scenario 2 there would be the potential to deliver some targeted new employment land, which would be supported including from a perspective of co-locating homes and jobs in support of balanced communities and minimising the need to travel. However, new employment land would likely be limited in scale, e.g. small employment and commercial units as part of neighbourhood hubs.
- 6.8.3. It is also the case that additional local labour supply could support and potentially stimulate the local economy, however, on the other hand, there could potentially be challenges in respect of out-commuting given few clear options for larger-scale new employment land.
- 6.8.4. Final considerations under Scenario 2 are then: A) problematic traffic congestion could impact negatively, including Southend Airport operations and the tourism industry; and B) there would be many local jobs over the course of the construction phases of LNOS; and C) implications for City Centre regeneration warrant consideration, but it is currently not possible to reach any clear conclusions.
- 6.8.5. Overall, there is a case for concluding a preference for Scenario 2, but this is not clear, so the scenarios are judged to perform on a par. As for the alternative assumption regarding support for LNOS in Rochford District a key consideration is little reason to assume the effect would be to support significant additional employment land.

6.9. Equality

Scenario 1 Emerging preferred 9,500 homes	Scenario 2 + Land North of Southend 14,000 homes	Alternative assumption: If LNOS were assumed to extend into Rochford would the performance of Scenario 2 improve or worsen?
=	=	No effect

6.9.1. It is difficult to suggest that the growth scenarios have any significant differential implications for groups with protected characteristics under the Equality Act 2010.


6.9.2. However, as per the discussion above under 'Communities', a comprehensive LNOS could be masterplanned with key issues and opportunities in mind. Also, there is the simple fact that housing needs would go unmet under Scenario 1 to a much greater extent than under Scenario 2, with implications for equality objectives, including recognising the potential to deliver family and specialist housing / accommodation as part of any LNOS scheme.

6.9.3. Further considerations in respect of Scenario 1 include:

- Whilst the strategy aims to respond to neighbourhood specific issues and opportunities, what can be achieved is still uncertain at a number of key sites / areas, and overall what can be achieved – e.g. to address areas of relative deprivation – is potentially quite limited.
- City centre regeneration has important implications, and in this regard, it is noted that quite a detailed policy approach has been developed, but there is a need for further work, as discussed in Section 5.4. Key considerations are potentially around: 1) whilst regeneration should be a major positive in the long term, in the short term there will be considerable disruption; and 2) delivering community infrastructure alongside new homes in the city centre could prove challenging, e.g. schools and childcare for young families.
- There is tentative support for the proposed approach of limited redevelopment of existing under-performing employment land for residential. Change of use at existing employment sites and more broadly a shift in the nature of local employment opportunities can risk impacts to those who rely on the existing employment opportunities, including those suited to lower skilled work, albeit concerns can be mitigated through a skills strategy.
- A related consideration is then support for those who rely on tourism for employment, and, in this regard, there is tentative support for Scenario 1. It is clear that a targeted approach to growth is proposed with a strong focus on protecting those characteristics of Southend that make it an attractive place to visit, with the provision of public car parking a factor.


6.9.4. In conclusion, it is not clear that there are any significant concerns, recognising limited direct links between the equality objectives and the spatial strategy / site allocations / approach to supply at the heart of the Local Plan (with many key equality issues/opportunities a more significant consideration at the planning application stage). However, this will be a subject to return to prior to plan finalisation, drawing upon consultation responses received.

6.10. Historic environment

Scenario 1 Emerging preferred 9,500 homes	Scenario 2 + Land North of Southend 14,000 homes	Alternative assumption: If LNOS were assumed to extend into Rochford would the performance of Scenario 2 improve or worsen?
2		Uncertain

- 6.10.1. LNOS is a rural and sparsely populated landscape such that historic environment sensitivity is overall relatively limited. As such, it is appropriate to conclude support for Scenario 2, recognising that the effect would be to reduce unmet need, which would or could have to be provided for elsewhere in a sub-region where there are some hotspot areas of constraint.
- 6.10.2. It can also be noted that Scenario 2 could potentially relieve some of the pressure for higher density developments in the Southend urban area, where there are important historic environment assets with a sensitive urban setting. However, the primary assumption for the purposes of appraisal is that this would not be the case to any significant extent (i.e. urban supply is not reduced under Scenario 2).
- 6.10.3. With regards to the 'alternative assumption' regarding Rochford DC support for LNOS, on the one hand the effect of a larger LNOS would be to encroach upon several listed buildings / clusters of listed buildings, including two that are Grade II* listed.
- 6.10.4. However, on the other hand, there is support for comprehensive masterplanned growth with green / blue infrastructure and heritage in mind, thereby minimising the risk of sub-optimal development creep / sprawl northwards over time.
- 6.10.5. With regards to significant effects, it is fair to flag support for progressing the local plan over a baseline scenario whereby the Council faces the presumption in favour of sustainable development. There are numerous sensitive sites across the urban area that could come under pressure for potentially problematic higher density development without an up-to-date Local Plan that secures a five year housing land supply for the Council.

6.11. Homes

Scenario 1 Emerging preferred 9,500 homes	Scenario 2 + Land North of Southend 14,000 homes	Alternative assumption: If LNOS were assumed to extend into Rochford would the performance of Scenario 2 improve or worsen?
2		Improve (significant)

- 6.11.1. Scenario 2 is clearly favoured but, and as discussed, even under Scenario 2 there would be significant unmet housing need, and there is little confidence regarding the potential for this to be provided for elsewhere. Also, even if unmet need can be provided for in a timely manner, it is the case that providing for needs distant from source is problematic.
- 6.11.2. Unmet housing need is highly problematic for a range of key objectives, including around meeting affordable housing (AH) needs, given that AH is primarily delivered by market-led schemes. Emerging viability work suggests LNOS is able to deliver affordable housing at a rate in excess of what can be achieved across development sites in the urban area, and also a good mix to including family homes and social rented AH for those most in need.


- 6.11.3. As for the alternative assumption regarding Rochford DC support for LNOS, it is difficult to draw conclusions; however, on balance it is considered appropriate to highlight a strong 'homes' case for a comprehensive LNOS scheme given the extent of housing need in Southend. It could also be that LNOS is seen as important for Rochford District as a means of providing for LHN (also affordable housing needs, etc), but this cannot be foreseen.
- 6.11.4. Overall, whilst it is recognised that Scenario 1 would deliver a step change in the rate of housing delivery (even after having accounted for the likelihood of increased rates of sites coming forward under the presumption in favour of sustainable development under the baseline / no plan scenario), there is a need to conclude a significant negative effect given the scale of unmet need, and also given challenges to delivering affordable housing in the urban area (particularly in central areas with lower viability). Scenario 2 performs much better but there would still be *at least* 10,000 homes unmet need that risks staying unmet.

6.12. Landscape

Scenario 1 Emerging preferred 9,500 homes	Scenario 2 + Land North of Southend 14,000 homes	Alternative assumption: If LNOS were assumed to extend into Rochford would the performance of Scenario 2 improve or worsen?
=	=	Worsen

- 6.12.1. There are clear sensitivities associated with LNOS, which is a valued agricultural landscape at the urban edge. It is also valued as Green Belt, recognising that the London Metropolitan Green Belt deliberately extends to include this land, but it is acknowledged that Green Belt is not a landscape designation.
- 6.12.2. However, the part of LNOS abutting Southend (Scenario 2) is associated with relatively low landscape sensitivity in the sub-regional context, with sensitivity then increasing to the north (Rochford District) given reduced influence of the urban edge and the road network and given expansive views across a flat estuary landscape from lanes and public rights of way, also recalling that the Essex Estuaries are an area visited by tourists.
- 6.12.3. Overall, it is difficult to conclude that Scenario 1 is preferable to Scenario 2 once account is taken of the fact that support for LNOS in Southend would have the effect of significantly reducing unmet need and therefore reducing pressure on a constrained sub-region.
- 6.12.4. With regards to significant effects, there is a need to consider whether the baseline scenario could be one whereby suboptimal schemes in the Green Belt gain permission under the presumption in favour of sustainable development. However, it is not clear that there will be significant risk in this regard, on the assumption that Green Belt at the edge of the Southend urban area is not categorised as grey belt (work is ongoing in this regard).


6.13. Soils and resources

Scenario 1 Emerging preferred 9,500 homes	Scenario 2 + Land North of Southend 14,000 homes	Alternative assumption: If LNOS were assumed to extend into Rochford would the performance of Scenario 2 improve or worsen?
	2	Worsen (significant)

- 6.13.1. Whilst under several environmental topic headings it is difficult to conclude that LNOS performs poorly after having considered it as an option in the sub-regional context, under this heading there is a need to flag a significant concern with LNOS, because this part of South Essex is associated with a distinct belt of higher quality agricultural land.

- 6.13.2. Specifically, the nationally available low-resolution dataset suggests that the entire LNOS area (cross-border) comprises grade 1 quality land, where land that is of grade 1, 2 or 3a is considered Best and Most Versatile (BMV) under the NPPF.
- 6.13.3. However, the majority of LNOS within Southend (but not all) has been surveyed in detail and been found to comprise a fairly even mix of land that is grade 1, grade 2, grade 3a and grade 3b (i.e. to include land ranging from that which is of highest quality nationally, to that which is not considered BMV). There is a clear case for surveying the entire LNOS area.
- 6.13.4. One other consideration is that development would risk sterilisation of known minerals deposits (brickearth); however, it is unclear whether minerals extraction would ever be supported and viable in this area, including noting BMV agricultural land.

6.14. Transport

Scenario 1 Emerging preferred 9,500 homes	Scenario 2 + Land North of Southend 14,000 homes	Alternative assumption: If LNOS were assumed to extend into Rochford would the performance of Scenario 2 improve or worsen?
	2	Improve (significant)

- 6.14.1. This is the crucially important sustainability objective when considering LNOS and growth in Southend more generally. The simple fact is that Southend's coastal location means that road traffic funnels into a single road corridor, namely the A127/ A1159 (and to a lesser extent the A13), and this corridor is associated with significant issues, including a single carriageway section where it connects to the A1159 Priory Crescent at 'Cuckoo Corner' junction and other junctions where capacity is an issue.
- 6.14.2. There is the potential for LNOS to fund major road infrastructure upgrades and also deliver measures to achieve a high level of modal shift (i.e. a shift away from the private car to public and active transport) but delivery remains uncertain at the current time, including in respect of the timing of upgrades (i.e. delivery 'upfront').
- 6.14.3. A range of key matters have been discussed above – including delivering a new link / distributor road, bus services (which require free flowing traffic, and potentially bus lanes at junction) and walking/cycling links – but one other key consideration of note is ensuring good links to existing train stations. Considerations include:
- Southend Airport Station – there is an opportunity for the western extent of LNOS within Rochford to link very effectively to the station, but this would require major new infrastructure. It could be that the opportunity can be realised to some extent were Rochford to bring forward this land in isolation (i.e. not as part of a wider LNOS scheme), potentially linking with the existing residential area to the west, but this would clearly be challenging and sub-optimal. A comprehensive LNOS scheme would deliver a new link road that meets Warners Bridge roundabout at its western extent very close to the Airport Station, and the link road could also be designed as a sustainable transport corridor.
 - Southend East and City centre stations – the potential for LNOS within Southend to deliver transport enhancements along the A13 corridor linking to Southend East Station and the city centre warrants further investigation.
 - Thorpe Bay Station – would be the closest station to for a large proportion of LNOS residents, and so there is a need to consider the potential for growth to deliver or facilitate upgrades, e.g. to enhance its role as a multi-modal transport hub.
- 6.14.4. Under Scenario 1 there would be less potential to realise transport and accessibility opportunities alongside growth, although it is recognised that concerted efforts have been made in this regard, including via considering urban growth options in combination by neighbourhood area, e.g. recognising that support for higher density growth along a road corridor could support a new active travel route or an improved bus service.

- 6.14.5. In conclusion, there would be transport opportunity to be realised through a comprehensive LNOS, but overall the current overriding consideration is the extent of uncertainty and risk.

6.15. Water

Scenario 1 Emerging preferred 9,500 homes	Scenario 2 + Land North of Southend 14,000 homes	Alternative assumption: If LNOS were assumed to extend into Rochford would the performance of Scenario 2 improve or worsen?
?	?	Uncertain

- 6.15.1. Beginning with water supply – i.e. ensuring supply potable water and ensuring that water levels do not impact on the water environment – this may be an issue for the Local Plan, subject to further work, with the IDP (2025) explaining that the scale of growth under Scenario 1 (in combination with growth in Rochford and potentially elsewhere) *“would impact the potable water network, given Hanningfield Reservoir does not have the capacity (as existing) for the projected growth.”*
- 6.15.2. It is difficult to conclude implications for growth scenarios, but a key priority is giving early certainty to water companies and other stakeholder / partner organisations regarding the scale and distribution of growth. For example, Essex and Suffolk Water published its most recent Water Resource Management Plan in October 2024 on the basis of assumptions regarding levels of growth in South Essex that are highly uncertain and potentially too low.
- 6.15.3. With regards to water quality, attention focuses on the capacity of Water Recycling Centres (WRCs) and wastewater storage elsewhere on the network, recognising that there is a widespread issue nationally of capacity breaches impacting the water environment. At WRCs there is a need to consider both hydraulic capacity, i.e. ability to store and treat wastewater, and also the environmental capacity of receiving water bodies, avoiding levels of discharges of treated wastewater beyond what is permitted by the Environment Agency.
- 6.15.4. It is noted that Southend WRC is located close to LNOS, and that there has been some recent upgrades to address the issue of odour, but it is not known what headroom capacity there is to accept further growth, or what potential there is to deliver further upgrades. The IDP (2025) is only able to draw a high-level conclusion, namely that: *“Growth in the Southend WRC catchment would likely impact on network capacity and improvements to wastewater infrastructure would be funded through charges to developer and Anglian Water investments.”* There is not known to be any suggestion of LNOS delivering a new WRC, and the potential to do so might well be constrained by the environmental sensitivities associated with the Essex Estuaries. In turn, it will be crucially important to gather evidence through the current consultation, with a view working with Anglian Water to explore issues and opportunities to inform local plan strategy, as opposed to leaving matters to the planning application stage when it can be more difficult to resolve issues leading to increased costs and delays to committed housing supply.
- N.B. the IDP (2025) explains that Anglian Water’s Drainage and Water Management Plan (DWMP, 2025) *“identifies that a moderate level of growth (non-quantified) is expected in Southend up to 2027 and up to 2045”* but this may well not be a safe assumption.
- 6.15.5. Finally, it is noted that the Anglian Water DWMP (2023) identifies Southend as one of two ‘pathfinder’ catchments where there will be a focus on funding and “innovative governance” to manage surface water to improve the environment, including extensive investment in green and blue infrastructure.
- 6.15.6. Overall, there is uncertainty in the absence of detailed evidence. Matters will be revisited subsequent to the current consultation, in light of consultation responses received including from the Environment Agency and the Water Companies.

6.16. Appraisal summary

- 6.16.1. Table 6.1 below presents a summary of the RA growth scenarios appraisal presented above. This is in the form of an appraisal 'matrix' with a row for each element of the SA framework (Section 3) and a column for each of the two RA growth scenarios. Also, a final column records whether the alternative assumption in respect of support for LNOS through the Rochford Local Plan would improve or worsen the appraisal conclusion for Scenario 2.
- 6.16.2. From Table 6.1 it is clear that there are pros and cons to both scenarios, and it is for the Council to 'weigh these in the balance' before deciding on a preferred approach.
- 6.16.3. There is a case for concluding an overall preference for Scenario 1 because, whilst both scenarios are ranked first under four topics, Scenario 1 is predicted more positive and fewer negative effects. However, this conclusion cannot be drawn with any certainty, because:
- The topics are not assumed to have equal weight, e.g. if the Council were to give weight to 'homes' objectives then it might be concluded that Scenario 2 is preferable.
 - There is a need to factor-in that the performance of Scenario 2 improves under a number of topics on the basis of the 'alternative assumption' regarding LNOS in Rochford District.
- 6.16.4. Furthermore, topic-specific appraisal conclusions are themselves often reached on balance and are open for discussion through the current consultation. As part of this, there is a need to acknowledge the inherent challenge of factoring-in the benefits of higher growth in order to minimise unmet need and therefore minimise pressure on a constrained sub-region. There could be wide-ranging positive implications, but these are highly uncertain.
- 6.16.5. With regards to the sensitivity test whereby there is an alternative assumption regarding support for LNOS in Rochford District (as opposed to the baseline assumption of no support for LNOS in Rochford), the appraisal table above indicates that, were it to be possible to assume support for LNOS through the Rochford Local Plan, then there could well be greater confidence regarding the overall merits of supporting LNOS through the Southend Local Plan. However, this is not entirely clear cut, particularly given agricultural land sensitivities, but also landscape sensitivities and transport infrastructure uncertainties.
- 6.16.6. On the latter point, it should be possible to reach firmer conclusions following the current consultation recognising that, whilst LNOS has been discussed for several years, further work on infrastructure delivery is required, including given the challenges of cross-border working (Southend-on-Sea, Rochford District and Essex County). Exploring issues and opportunities in respect of delivering transport infrastructure is a clear priority, but there are also key and complex matters to explore around community and wider infrastructure. There is a need to confirm what could viably be delivered and when, drawing upon consultation responses and wider engagement with stakeholder and partner organisations. Also, ongoing consideration of LNOS must factor-in the sub-regional context, accounting for local plan-making not only in Rochford District but also elsewhere across South Essex. Finally, it is also important to say that Green Belt Assessment is ongoing and must also factor-in.

Table 6.1: Reasonable growth scenarios appraisal summary¹¹

	Scenario 1 Emerging preferred 9,500 homes	Scenario 2 + Land North of Southend 14,000 homes	Alternative assumption: If LNOS were assumed to extend into Rochford would the performance of Scenario 2 improve or worsen?
Topic	Order of preference (numbers) and predicted significant effects (shading)		
Accessibility	2	1	Improve (significant)
Air quality	1	2	Improve
Biodiversity	2	1	Improve
CC adaptation	=	=	Improve
CC mitigation	=	=	Improve
Communities	1	2	Improve
Economy / employment	=	=	No effect
Equality	=	=	No effect
Historic env.	2	1	Uncertain
Homes	2	1	Improve (significant)
Landscape	=	=	Worsen
Soils and resources	1	2	Worsen (significant)
Transport	1	2	Improve (significant)
Water	?	?	Uncertain

¹¹ Under each sustainability topic, i.e. within each row of the table, the aim is to: 1) rank the scenarios in order of performance (with a star indicating best performing); and then 2) categorise the performance in terms of 'significant effects' using red / amber / light green / green, where: **red** indicates a significant negative effect; **amber** indicates a negative effect of limited or uncertain significance; **light green** indicates a positive effect of limited or uncertain significance; **green** indicates a significant positive effect; and **no colour** indicates a neutral effect.

7. The preferred growth scenario

Introduction

- 7.1.1. The following text was **prepared by Southend City Council Officers** in response to the appraisal above (by AECOM). The text below does not amount to an appraisal.

Reasons for supporting Growth Scenario 1

- 7.1.2. Scenario 1 is taken as the preferred approach at the current time, but the current consultation document is also clear that Scenario 2 is a reasonable alternative.
- 7.1.3. There is a need to progress the Local Plan to the Regulation 19 publication / submission stage as soon as possible, but the intention is to gather detailed information on both scenarios through the consultation such that a final decision can then be made.
- 7.1.4. Focusing on Scenario 1 (urban area plus Fossetts Farm; no Green Belt release at LNOS), the appraisal highlights certain drawbacks relative to Scenario 2 (Scenario 1 plus LNOS). However, some of these drawbacks are reached on the basis of considerable assumptions that can be questioned, notably in respect of the merits of reducing unmet need in terms of reducing pressure for growth elsewhere in South Essex.
- 7.1.5. Overall the appraisal enables a conclusion that Scenario 1 is:
- “Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence” (NPPF para 36).*
- 7.1.6. This conclusion will need to be revisited subsequent to the current consultation, in light of analysis of consultation responses, ongoing technical work and latest understanding regarding the potential for unmet need from Southend to be provided for elsewhere.
- 7.1.7. Although not specifically for this sustainability appraisal, there remains an inherent risk of Scenario 1 not being found sound at examination when considered against the provisions of the NPPF – with regard to the limited Green Belt release despite significant and substantial unmet housing needs. In this regard it is imperative that Scenario 2 remains a reasonable alternative prior to a final decision on the preferred strategy of the final draft plan (i.e. Scenario 1 or Scenario 2) – as informed by consultation feedback, duty-to-co-operate and further evidence as described above.
- 7.1.8. With regards to the ‘sensitivity test’ whereby there is an alternative assumption in respect of Scenario 2, namely an assumption that the Rochford Local Plan supports LNOS, a clear message received through the appraisal is that a cross-border scheme (which, to be clear, is outside the scope of the Southend Local Plan) would bring additional benefits. The appraisal is clearly supportive of comprehensive masterplanned and infrastructure-led growth, and this is acknowledged and can feed into ongoing work. However, there are concerns regarding any LNOS scheme given inherent constraints to growth, perhaps most notably relating to impacts on the transport network and Green Belt.



Two consultations have been held under Regulation 18 prior to the current consultation

Part 2: SA findings at this stage?

8. Introduction to Part 2

- 8.1.1. The aim here is to appraise the 'Preferred Approach' as a whole under the SA framework, i.e. with an appraisal discussion presented under each of the 13 SA topics in turn.
- 8.1.2. This is an opportunity to: A) discuss the merits of the preferred approach to spatial strategy / sites / supply in isolation as opposed to alongside a higher growth alternative; and B) comment on the thematic and other development management (DM) policies that also form part of the Preferred Approach currently published for consultation.
- 8.1.3. With regards to (A), the Preferred Approach key diagram has already been presented above as Figure 5.17. Figure 9.1 shows a variation on the key diagram, with a particular emphasis on transport infrastructure. A key point to note is the four growth areas shown in yellow. Also, Figure 9.2 shows all 'site proposals' (allocations and opportunity sites) and Figure 9.3 shows the proposed distribution of housing growth across Southend's neighbourhoods.
- 8.1.4. With regards to (B), it should be noted that the current consultation document presents 'options' for several thematic / DM policy areas, and these are discussed below.

Figure 9.1: The Preferred Approach (simplified key diagram with transport focus)



Figure 9.2: Proposed site allocations and opportunity sites

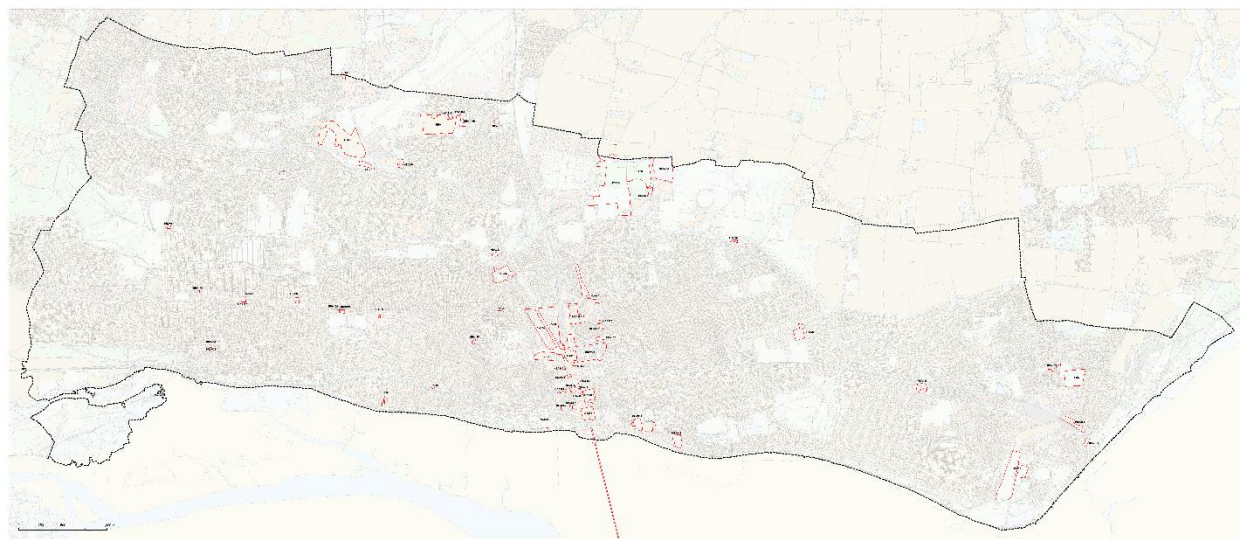
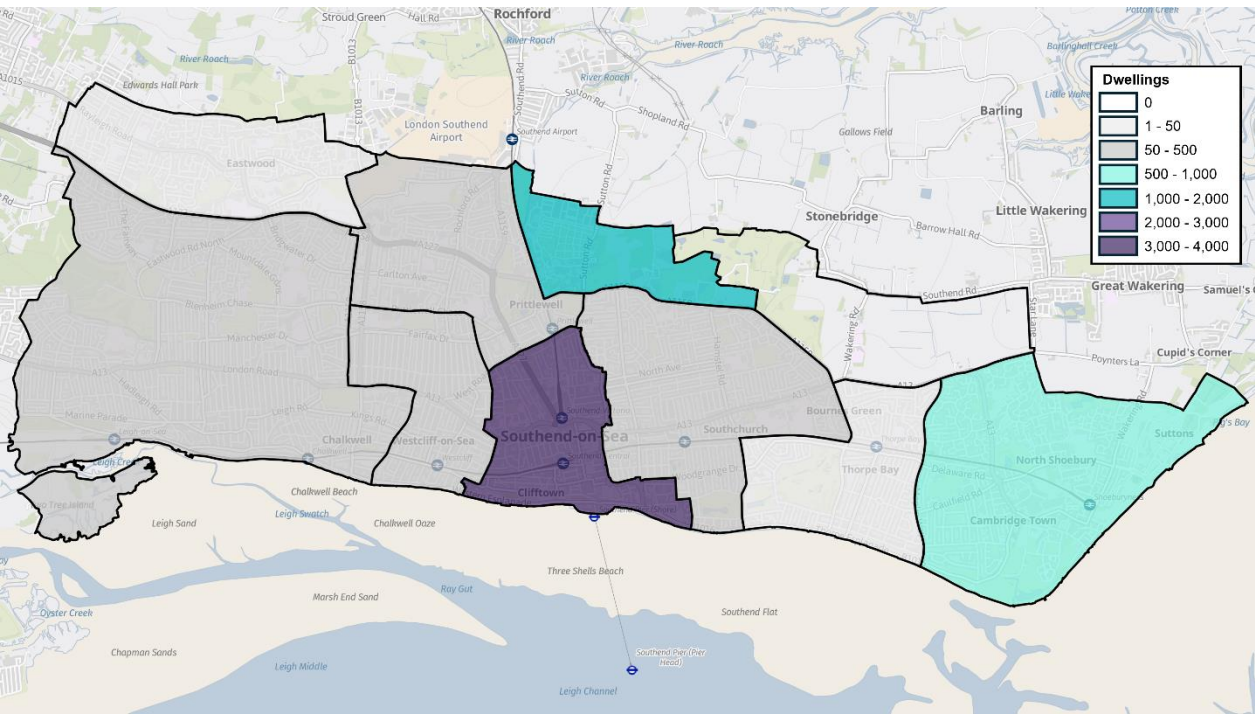


Figure 9.3: Distribution of housing growth



9. Appraisal of the ‘Preferred Approach’

9.1. Introduction

- 9.1.1. A brief appraisal commentary is presented under each of the SA framework headings in turn. The appraisal is light touch recognising the potential for further work subsequent to the current consultation, when the plan will be reaching its final draft form and all of the evidence base will be in place, including consultation responses and technical evidence.
- 9.1.2. Also, where the current consultation document presents options in respect of DM policies these are a focus of the commentary below. The aim is not to present a formal appraisal (because none of the sets of options are considered to be ‘reasonable alternatives’) but it is nonetheless appropriate to focus on the policy areas where the Council sees a key choice.

9.2. Accessibility

- 9.2.1. The appraisal in Part 1 predicts a **neutral effect** for the Preferred Approach, but this conclusion is potentially marginal to the downside, because there are risks in respect of community infrastructure capacity, particularly in terms of schools, health centres and open / green / recreational space.
- 9.2.2. Strategic Policy SP3 (Securing and Improving Infrastructure) commits to “*expansion of existing schools and the provision of new education facilities*” and “*healthcare and community facilities, including two new primary care facilities potentially within the City Centre and Shoeburyness*”. However, there are uncertainties at this stage, including recognising the challenges of funding in the context of development viability constraints.
- 9.2.3. Focusing on schools, Policy SP3 goes on to state: “*the provision of a new school may be required subject to further testing. Two potential sites have been identified, one within Prittlewell and the other in Shoeburyness (Site Proposal HEA141 and HEA137)*”. However, a headline question is whether there is the potential for either school to be a secondary, recognising that the IDP identifies the need for 10 new forms of entry. Also, at both sites the number of homes that could be delivered alongside a school is yet to be confirmed.¹²

9.3. Air quality

- 9.3.1. The appraisal in Part 1 predicts a **neutral effect** for the Preferred Approach, and there is limited potential to meaningfully elaborate. Urban focused growth is supportive of minimising car movements, particularly where growth is targeted to transport corridors and hubs (including to support upgrades to services and infrastructure), but there are nonetheless concerns given inherent traffic and air quality constraints.

9.4. Biodiversity

- 9.4.1. The appraisal in Part 1 predicts a **neutral effect** for the Preferred Approach but does flag a possible risk/uncertainty in respect of mitigating the recreational impacts of growth on the internationally designated Essex Estuaries, ahead of further detailed work through a Habitats Regulations Assessment (HRA).
- 9.4.2. It is also important to consider two DM policies – Policy DM8.5 (Biodiversity and Net Gain, BNG) and Policy DM8.3 (Urban Greening Factor) – as both have development viability implications (and, in turn, implications for the achieving wider objectives, e.g. affordable housing, net zero development, infrastructure delivery).

¹² HEA137 is potentially well-located noting that Shoeburyness is a key proposed growth area, but the site is subject to ground contamination (although could be subject to remediation). HEA141 is in a more peripheral location, whilst the IDP notes that the need for new capacity could be widespread across the urban area (and there is a need for further work to confirm the potential for existing schools to expand).

- 9.4.3. Beginning with BNG, the proposal is to require only the nationally standard approach (required under the Environment Act), which involves development proposals achieving 10% net gain (as measured using a national metric). The Essex Design Guide advocates for 20% but there may be relatively limited potential to require this in the Southend context, given development viability constraints and also given inherent limitations in respect of finding sites to deliver new or enhanced habitat to compensate for instances of development sites failing to achieve the requisite gain onsite.
- 9.4.4. With regards to the Urban Greening Factor, **two options** are presented: 1) apply city-wide for all major developments to ensure increased green infrastructure across Southend which is predominantly a dense urban area albeit with a more suburban leafy character at its western and eastern edges; and 2) apply only to major developments within specific neighbourhoods (Westcliff, Southend Central and Southchurch) to address the lack of green infrastructure in these locations, drawing upon the evidence set out in the Heat Stress Strategy 2022. Clearly there is strong support for Option 2 from a biodiversity perspective and also from a climate change adaptation perspective; however, there is a need to recognise that there would be additional development viability implications (and, in turn, implications for wider objectives), such that a targeted approach could strike a good balance (although it would generate a degree of additional policy complexity).

9.5. Climate change adaptation

- 9.5.1. The appraisal in Part 1 predicts a **neutral effect** for the Preferred Approach but notes a need for ongoing scrutiny in respect of ensuring a sequential approach to avoiding flood risk, plus there is a need to recognise that urban intensification / densification can lead to risks in respect of the urban heat island effect and resilience to future heatwaves (which links to discussion of the Urban Greening Factor).
- 9.5.2. An important site for ongoing scrutiny is HEA051 at Shoeburyness (210 homes plus other uses including a health centre) albeit the site has planning permission. The site comprises an area adjacent to the coast that has historically been left undeveloped presumably on account of the land entirely falling within flood zone 3, but has now been found to pass the flood risk sequential and exception tests and has ultimately been granted planning permission, accounting the unique nature of what it can deliver (in the context of pressing housing needs etc), the potential to design-out flood risk (e.g. with living accommodation and the health centre at least 6.5m above sea level; and less vulnerable uses including non-living residential space and commercial at least 3m above sea level) and the potential to respond effectively in the case of a flood (an agreed Flood Response Plan).
- 9.5.3. Another site for ongoing scrutiny is HEA054, which is a currently demolished/vacant seafront site, previously used for amusements, which is partly within flood zone 3. However, the flood risk zone (as currently defined, noting that these are subject to change) only affects the southern ~1/5 of the site and, as a seafront town centre site that has been vacant for many years (detracting from an adjacent conservation area), the potential for redevelopment to be supported as an exception, despite flood risk, can be envisaged. The current proposal is for a mixed use scheme to include 282 homes (flats), which reflects a current planning permission from 2014.
- 9.5.4. One other site of note is also associated with the seafront, where again there is a strong case for development / intensification despite flood risk. Specifically, HEA042 is a former gas works that is currently in use as a car park, and is now proposed for: *“Retention of public parking with potential for mixed use development particularly to the north of the site...”* The site is in the lower risk coastal flood risk area, namely the area to the east of the town centre that affects a significant number of existing residential roads.
- 9.5.5. Finally, with regards to DM policy, most of the requirements are fairly standard (in the context of forthcoming National Development Management Policies, NDMPs), for example each of the neighbourhood-specific policies requires: *“Development should seek to avoid the risk of flooding, unless otherwise allocated for development, and incorporate sustainable urban drainage systems (SuDS).”* However, two locally specific policies of note are:

- Policy N5b (Central Seafront) – there is support for development, but the supporting text explains: *“The Central Seafront area is at risk of flooding from tidal and surface water flooding, including areas within the Environment Agency Flood Zones 3a (higher risk) and Flood Zone 2 (lower risk). Therefore, all development within the Central Seafront area should have particular regard to Policy DM9.4 relating to Flood Risk Management and Sustainable Drainage.”*
- Policy DM8.4 (Southend Foreshore) – there is a requirement within each of the defined sub-areas bar one to: *“Manage flood risk and coastal defences including nature-based solutions wherever possible.”*

9.6. Climate change mitigation

- 9.6.1. The appraisal in Part 1 predicts a **‘moderate or uncertain’ negative effect** for the Preferred Approach, recognising that climate change mitigation is a national priority, such that there is a need to ensure that decarbonisation is a key driver of spatial strategy / site selection, albeit also acknowledging that there is no locally established net zero target date (i.e. the national target of 2050 applies, along with interim milestone dates).
- 9.6.2. The focus of discussion under this heading is built environment decarbonisation and, in this regard, a key matter is directing growth to locations with strong development viability, such that there is a greater likelihood of there being viability ‘headroom’ to deliver greenhouse gas emissions / decarbonisation standards over-and-above the requirements set out in Building Regulations (which are being tightened to a Future Homes Standard).
- 9.6.3. In this regard, it is important to note that the Council is giving consideration to requiring that major schemes achieve ‘net zero development’, i.e. a situation whereby energy use from a development (operational emissions only, i.e. excluding ‘embodied’ emissions) are matched by new renewable energy generation over the course of a year, which should ideally be onsite (‘onsite net zero’, which will typically mean extensive use of rooftop solar panels), but which can offsite as a last resort (‘offsetting; this will typically mean investing in offsite renewable power generation, but could also mean investing in other offsite decarbonisation measures such as tree planting, so long as ‘additionality’ can be proved, which can be challenging hence offsetting is a last resort).
- 9.6.4. Specifically, this is Option 2 of **two options** proposed for Policy DM9.1 (Sustainable Design and Construction) Criterion 3(a), whilst Option 1 involves relying on Building Regulations. There are then two further points to note regarding Option 2: A) applicants would be required to calculate performance / demonstrate net zero using the “energy-based” method, which is strongly favoured by industry specialists and supported by many emerging local plans, including because it is simple and intuitive, but which is not supported by the Government (a Written Ministerial Statement from December 2023 remains extant that seeks to ban this approach); and B) the requirement would be to demonstrate compliance with the energy hierarchy, not only in terms of achieving onsite net zero if at all possible (ahead of offsetting), but also minimising energy use (heat and power) as far as possible through efficiency measures ahead of relying upon onsite renewable energy generation.
- 9.6.5. Ultimately, requiring net zero development is strongly supported from a ‘climate change perspective’, but will need to be very carefully considered in terms of development viability, given potential implications for delivery (i.e. delivering on the committed housing requirement) and wider policy objectives with cost/viability implications (most notably affordable housing). As for requiring the energy-based approach, this is also strongly supported, but the reasons given in the Written Ministerial Statement for not supporting this approach (i.e. expecting applicants to use the Building Regs ‘TER’ methodology) are acknowledged, including in terms of ensuring a nationally consistent policy environment.

- 9.6.6. Finally, the current consultation document also presents **two options** for Policy DM9.1 (Sustainable Design and Construction) Criterion 3(a) which deals with ‘embodied’ emissions, namely: 1) simply encourage retention of existing buildings and/or structures where possible as well as ‘circular economy’ principles; and 2) apply the approach advocated by the Essex Design Guide, to include “no demolition unless justified to the satisfaction of the LPA.” Minimising embodied carbon (also known as ‘non-operational’ emissions) is extremely important, but again there is a need to proceed with caution to avoid affecting site viability and delivery and, in turn, the ability to deliver on the committed housing requirement. National practice in respect of applying circular economy principles as part of construction is evolving rapidly but is still somewhat in its infancy (less so in London, where practice is more established), such that requirements can be seen as burdensome of developers and house-builders and, in turn, there is also a need to consider whether the burden could weigh heavily on SME builders.
- 9.6.7. In conclusion, there is a case for upgrading the ‘moderate or uncertain’ negative effect discussed above on account of the DM policy ambition. However, a decision on DM policy will need to be made subsequent to the current consultation in light of factoring in whole plan viability and, in any case, it is important to make every effort to address climate change mitigation through spatial strategy and site selection rather than placing undue reliance on DM policies that risk not being fully implemented at the planning application stage.

9.7. Communities

- 9.7.1. The appraisal in Part 1 predicts a **‘moderate or uncertain’ positive effect** for the Preferred Approach, but there are some risks / potential concerns, mostly relating to matters already discussed above under ‘Accessibility’ heading in respect of community infrastructure and the ‘Air quality’ heading in terms of traffic congestion.
- 9.7.2. With regards to DM policies, the key point to note is strong support for the neighbourhoods-based approach, with a view to effectively addressing priority growth-related issues and opportunities. Some of the neighbourhood-specific policy criteria are fairly standard (i.e. repeated for each neighbourhood), but others seek to respond to particular issues, including those understood to be of importance to local residents and organisations on the basis of the previous two consultations and wider engagement.
- 9.7.3. Neighbourhoods directed higher growth are shown in Figure 9.3 above, namely:
- Fossetts – the proposal is to deliver a new neighbourhood at the northern extent of the urban area, and, amongst other things, a key requirement is as follows: *“Pedestrian and cycle connectivity will be enhanced throughout the neighbourhood, including opportunities to improve links between new and established residential areas, commercial centres and protected green spaces and public rights of way, including between Priory Park, Garon Park and the east of the City.”* Whilst it is noted that the scheme will not deliver a primary school, there is an existing school nearby located on the south side of Eastern Avenue (a busy dual carriageway, although there are some pedestrian crossing points).
 - Southend Central – is naturally a key focus of growth. There will be a need for further work in respect of site capacities taking account of wide ranging factors including around design, infrastructure delivery and viability / deliverability and the tourism industry.
 - Shoeburyness – it is noted that the neighbourhood policy identifies a number of growth-related opportunities, including around: the public transport corridor from Shoeburyness Station, via the A13 and A1159; the public realm around Ness Road and the City’s cycle network, including the coastal path; and Shoeburyness railway station as a mobility hub.

9.8. Economy/employment

- 9.8.1. The appraisal in Part 1 predicts a **neutral effect** for the Preferred Approach, recognising that the proposal is to provide for the minimum need figure as established by the Economic Development Needs Assessment (2024).

- 9.8.2. Also, there is support for the detailed policy approach in respect of proposals for protecting and intensifying existing employment sites, including across the neighbourhood polices.
- 9.8.3. However, it is important to note that the Needs Assessment encourages the Council to give consideration to a higher growth scenario, as discussed in Section 5.2.
- 9.8.4. As such, ahead of plan finalisation there will be a need to explore ways of boosting employment land supply, alongside giving further consideration to the question of boosting housing supply (and, in turn, minimising out-commuting).
- 9.8.5. Finally, it is noted that there is a strong emphasis on developments implementing an Education and Skills Plan and will be expected to contribute to the cost of monitoring (£100 per dwelling; **two options** are presented).

9.9. Equality

- 9.9.1. The appraisal in Part 1 predicts a **neutral effect** for the Preferred Approach, finding that it is difficult to draw strong conclusions in respect of the preferred approach to growth (i.e. the housing requirement, spatial strategy and site selection) for equality objectives over-and-above points discussed under other topic headings.
- 9.9.2. There are numerous DM policies that are supportive of equality objectives, but most are more-or-less standard policies, as opposed to responding to a Southend-specific issue or opportunity. An example is Policy DM5.7 (Housing & Accommodation for Older People) and Policy DM5.8 (Supported Accommodation (Specialist and Vulnerable Needs)).
- 9.9.3. Finally, there is support for the detailed policy approach in respect of the city centre, although ongoing work is needed to ensure a clear suite of policies to deliver on the vision. The following list of key issues is considered commendably clear and helpful:
- The need to regenerate the High Street following the national decline in the traditional comparison goods retail function in town centres due to changing shopping patterns;
 - Opportunities to regenerate the Queensway area to the north-east of the High Street as a residential-led community project that will be better integrated with the City Centre;
 - Identifying opportunities for new housing at higher densities within the neighbourhood focussed to the City Centre and Central Seafront that will assist regeneration and meet a range of local housing needs, including for families, younger and older residents;
 - Further regeneration of the Central Seafront area to provide opportunities to enhance leisure and tourism, providing a year-round destination and enhancing visitor accommodation;
 - Improving transport and travel choices, including for walking and cycling, public transport and enhance access to public parking to support the economic vitality of the area;
 - Securing heritage led regeneration of key assets including the Pier and Kursaal and enhancing the unique character and identity of its conservation areas;
 - Enhancing and improving the public realm and green spaces, including greening of the High Street and adjoining routes;
 - Protecting and enhancing the natural assets of the foreshore.

9.10. Historic environment

- 9.10.1. The appraisal in Part 1 predicts a **'moderate or uncertain' positive effect** for the Preferred Approach recognising that: A) whilst a number of the proposed locations for growth intersect or are in close proximity to a designated asset, these are assets already associated with an urban setting and there will be good potential to account for sensitivities at the planning application stage; and B) the baseline situation is one whereby growth continues to come forward under the presumption in favour of sustainable development.

- 9.10.2. The key question is whether the Local Plan will set a policy framework to ensure that sites come forward in the urban area in a way that accounts for historic environment issues and opportunities recognising that this can have a significant bearing on masterplanning, design etc and, in turn, a bearing on wider policy objectives and viability. There will be a need to account for the consultation response received from Historic England, but as things stand there is a good degree of confidence. In particular, it is noted that listed assets (including locally listed) feature prominently in site-specific policies, and these policies do much to allay concerns regarding a potential tension between delivering urban intensification and conserving the designated assets and historic character. Also, the local specificity in Policy N5a (City Centre) and Policy N5b (Central Seafront) helps to generate confidence.

9.11. Homes

- 9.11.1. The appraisal in Part 1 predicts a **significant negative effect** for the Preferred Approach, which is an inevitable conclusion given at least 14,500 homes unmet need without any confidence regarding the potential for unmet need to be met elsewhere.
- 9.11.2. There is also a need to recognise that an urban focused strategy (albeit recalling that a new urban edge community is proposed at Fossetts Farm) will not be well-suited to delivering family housing, and that urban sites can face viability challenges with implications for affordable housing delivery, indeed it is not uncommon for urban redevelopment sites to deliver no affordable housing, with there being local case studies in this regard.
- 9.11.3. Another matter for consideration is the level of certainty associated with the proposed supply, noting constraints affecting certain sites (e.g. flood risk) and proposed policy requirements (e.g. consideration is being given to the possibility of resisting demolition / requiring re-use of buildings), noting the planning history of some sites (e.g. HEA054 discussed above) and noting that housing capacity of some sites is yet to be confirmed (including two sites where there may or may not be a need to deliver a new school).
- 9.11.4. Delivery risk suggests the need for a healthy 'supply buffer' (or 'headroom'), i.e. a situation whereby the identified supply is comfortably in excess of the housing requirement as a contingency for unforeseen delivery issues (at least over the early years of the plan period, given the potential to boost supply for latter years through a plan review). Otherwise there could be a risk of not delivering on the housing requirement, i.e. failing to maintain a five year housing land supply or failing the Housing Delivery Test, although, were this to happen, the presumption in favour of development would apply with a view to remedying the situation from a housing supply perspective (but with wider drawbacks).
- 9.11.5. Having made these points, there are many positive aspects to the Preferred Approach.
- 9.11.6. Firstly, a clear policy framework will greatly de-risk the process of bringing forward planning applications in the urban area, both at allocations and windfall sites. In particular, the neighbourhood-specific policies each include policy criteria under 'Homes' heading that seeks to ensure a well-targeted approach. As part of this, within six neighbourhoods there is a policy criterion specifying where a particularly "positive" approach should be taken to windfall development (essentially in accessible locations and along key public transport corridors where investment can be well-targeted), which is very important as it assists with confidence regarding the windfall assumption and, in turn, the total local plan supply.
- 9.11.7. Secondly, latest evidence can be drawn upon to set an AH requirement not only in terms of the proportion of homes at qualifying schemes that should be affordable (proposed to be 30%) but also tenure split, i.e. the proportion that should be social rented (recognising that the developer makes least profit from homes of this tenure). It seems clear that AH is being prioritised amongst the numerous potential policy asks of developers, but this will be a matter for further scrutiny ahead of plan finalisation, including with a view to ensuring a deliverable plan / a plan without unacceptable levels of delivery risk.

9.12. Landscape

- 9.12.1. The appraisal in Part 1 predicts a **neutral effect** for the Preferred Approach recognising that whilst the strategy is strongly urban focused (Fossetts Farm generates limited concern) it will also generate unmet housing need that leads to pressure on a constrained sub-region.
- 9.12.2. With regards to DM policies, attention focuses on the neighbourhood specific policies that aim to respond to specific local issues and opportunities. Policy criteria supportive of landscape/townscape objectives include:
- Fossetts – the following help with targeting onsite and offsite investment: *“Support public realm improvements along Eastern Avenue to reduce the severance effect of the road... and create and enhance public realm and active travel connections... [with] surrounding areas including Fossetts Way Retail Park, employment areas and Garon Park.”*
 - Leigh – similarly the following should assist with ensuring well-targeted investment: *“Support public realm improvements and urban greening focused on Leigh District Centre, Neighbourhood and Local Centres, A13 Key Passenger Transport Corridor, Leigh and Chalkwell railway station and Seafront.”*
 - Southchurch – public realm improvements should be “focused on Southchurch Road”.
 - Westcliff – again there is policy criteria relating to the targeting of public realm improvements, and furthermore: *“Development along the seafront will have regard to... Policy Table DM8.4: Seafront Character Zones (as defined on the Policies Map).”*

9.13. Soils and resources

- 9.13.1. The appraisal in Part 1 predicts a **neutral effect** for the Preferred Approach recognising that whilst the urban focused strategy will mean limited direct loss of BMV agricultural land, the unmet need generated could lead for pressure to develop BMV land elsewhere.
- 9.13.2. Focusing on the two main greenfield allocations: Fossetts Farm has mostly been surveyed and found to comprise grade 3b quality land (i.e. not BMV), plus the land is not in agricultural use; whilst Land South of Eastwoodbury Lane is in arable cultivation and is shown by the national dataset to be of grade 2 quality (but has not been surveyed).

9.14. Transport

- 9.14.1. The appraisal in Part 1 predicts a **‘moderate or uncertain’ negative effect** for the Preferred Approach, recognising the inherent transport constraints to the growth locally and the limited potential to deliver upgrades via an urban focused strategy. Many parts of Southend are highly accessible in transport terms, but there are also some less accessible (accounting not only for the location of train stations but also areas with reduced access to a bus service, also noting challenges on the bus network relating to traffic pinch points) and there is also some evidence of negative trends over time in respect of rates of active travel.
- 9.14.2. Having said this, there is ongoing work, including detailed modelling, aimed at building a detailed understanding of the issues and opportunities that exist. This includes building an understanding of the potential for growth to deliver or facilitate targeted transport infrastructure and bus service upgrades aimed at supporting modal shift away from the private car and also minimising congestion at key locations (itself potentially supportive of modal shift, in terms of allowing space for busses and cyclists). Two key issues are: A) the cycle network is fragmented (with two exceptions, namely the Prittlewell Greenway and National Cycle Route 16); and B) reliability of bus services is below the national average.
- 9.14.3. Ultimately, there is a need to ensure that a ‘vision-led’ approach to transport planning feeds into the Local Plan, including influencing decisions on development densities at key sites. An urban focused strategy does limit the potential to deliver upgrades, but it is still possible to target growth to key hubs and corridors, with a view to funnelling development investment towards key projects, e.g. in line with the emerging Local Cycling and Walking Infrastructure Plan (LCWIP). Within the neighbourhood-specific policies a range of key opportunities are identified, including as already discussed above (under ‘Communities’).

- 9.14.4. Finally, having said that there are concerns with the proposed growth strategy at the Southend scale from a transport perspective, it is also important to note that generating unmet need is problematic from a transport perspective as it can generate additional trips including additional commuting to work.

9.15. Water

- 9.15.1. The appraisal in Part 1 predicts a **‘moderate or uncertain’ negative effect** for the Preferred Approach recognising that there are a range of uncertainties ahead of consultation, in terms of both wastewater treatment capacity and water supply.
- 9.15.2. It is difficult to meaningfully elaborate further here, other than to state support for the proposal to implement the optional higher water efficiency standard under the Building Regulations (Part G) of 110 litres per person per day, which contrasts to current across Essex of 152 litres per person per day. It is not unknown for local plans to seek more stringent standards still, but this has development viability implications, such that this approach is only likely to be justified in the most water-stressed areas.

9.16. Appraisal conclusion

- 9.16.1. Under the majority of sustainability topics the appraisal predicts an overall ‘moderate or uncertain’ positive or a neutral effect, but within this flags aspects of the Preferred Approach with merit and/or which generate a tension with sustainability objectives (that, in turn, should be explored further ahead of plan finalisation also accounting for consultation responses).
- 9.16.2. A significant negative or ‘moderate or uncertain’ negative effect is then concluded under four topic headings, namely:
- Homes (most significantly) – because the Local Plan is set to generate significant unmet need and there is a lack of confidence regarding this being provided for elsewhere.
 - Climate change mitigation – given a ‘high bar’ to concluding that a local plan reflects the level of ambition needed to align with national and local targets. Whilst the consultation document explores ambitious DM policy, it remains to be seen what will be possible in this regard and, in any case, it is important to ensure a strong focus on avoiding greenhouse gas emissions in the first instance through spatial strategy / site selection.
 - Transport – recognising inherent transport constraints to growth locally and the limited potential to deliver upgrades via an urban focused strategy.
 - Water – because there are outstanding uncertainties in respect of both water supply and wastewater treatment, albeit these may be resolved.
- 9.16.3. It is difficult to make specific recommendations, because any recommendation made with a view to improving the performance of the Local Plan under one sustainability topic heading could have knock-on implications for performance under another heading. For example, it would be easy to recommend that the Local Plan should require 35% affordable housing (rather than 30%) but there would be implications for wider objectives with cost implications.
- 9.16.4. Focusing on DM policy, moving forward it will be important to consider the implications of policy requirements in the round where they are associated with a cost for developers, with a view to striking the right balance between policy priorities (e.g. affordable housing versus infrastructure versus wider policy asks) and ensuring that the cumulative effect of policy requirements is not to render aspects of the committed supply unviable particularly in parts of the urban area where viability is more challenging.
- 9.16.5. Finally, the ‘cumulative effects’ of the Local Plan in combination with other plans across South Essex are crucially important, most notably in respect of delivering on housing needs, but also in terms of a range of wider objectives. A key issue moving forward, as discussed in Part 1 of this report, will be making every effort to reduce the gap between Local Housing Need (LHN) and the identified housing supply / the proposed housing requirement with a view to minimising unmet need.

Part 3: Next steps

10. Plan finalisation

- 10.1.1. Following the Preferred Approach with Options consultation consideration will be given to responses received, and further evidence-gathering / analysis and SA work will be undertaken as necessary, before the Council then prepares the Proposed Submission Local Plan for publication under Regulation 19 of the Local Planning Regulations.
- 10.1.2. The formally required SA Report will be prepared for publication alongside, essentially tasked with presenting an appraisal of “the plan and reasonable alternatives”.
- 10.1.3. Once the period for representations on the Local Plan / SA Report has finished the intention is to submit the plan for examination in public alongside a summary of the main issues raised through the Regulation 19 publication period.
- 10.1.4. At examination one or more Government-appointed Inspector(s) will consider representations before identifying modifications necessary for soundness.
- 10.1.5. Modifications will then be prepared (alongside SA if necessary) and subjected to consultation (alongside an SA Report Addendum if necessary).
- 10.1.6. Once found to be ‘sound’ the Local Plan will be adopted.
- 10.1.7. At the time of adoption a ‘Statement’ must be published that sets out (amongst other things) “the measures decided concerning monitoring”.

11. Monitoring

- 11.1.1. The SA Report must present “measures envisaged concerning monitoring”.
- 11.1.2. On the basis of the appraisal there would be a case for redoubling efforts in respect of detailed monitoring of housing delivery, including by location, type and tenure.
- 11.1.3. Also, if the Council takes forward an ambitious DM policy requirements in respect of net zero development it will be crucial to monitor implementation of this policy, as it is crucially important not to place undue reliance on policies that are not fully implemented in practice.
- 11.1.4. Further consideration might also be given to monitoring indicators in respect of employment land, as this is a key area where up-to-date data on need vs supply is crucial to informing strategy / plan-making.
- 11.1.5. Finally, it is recognised that the Government has placed a considerable emphasis on an ‘outcomes’ approach to local plan-making, and central to this is gathering good data that can then be used to understand the baseline situation for an area and, in turn, used to inform the assessment of options for local plan interventions (policy, strategy, etc). The Government recently published a [draft](#) Outcomes Framework for Local Government, which includes a large number of metrics that might be a focus of ongoing monitoring. Within this, one of the key focuses is on health metrics, and this is a matter of considerable relevance to Southend. As part of any future monitoring in respect of health outcomes, consideration can also be given to two recent publications dealing with the links between local plan-making and health. Those publications are available [here](#) and [here](#) and both include a considerable emphasis on gathering data that can then be used to inform local plan-making.

Appendix I: Regulatory requirements

As discussed in Section 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report. However, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2, whilst Table B explains this interpretation (N.B. this current report is an Interim SA Report, as opposed to the SA Report, but nonetheless aims to present the information required of the SA Report). Table C then presents a discussion of more precisely how the information in this Interim SA Report reflects the requirements for the SA Report.

Table A: Questions answered by this Interim SA Report, in-line with an interpretation of regulatory requirements

Questions answered			As per regulations... the SA Report must include...
Introduction	What's the plan seeking to achieve?		<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the SA scope?	What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the sustainability 'baseline'?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?		<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2	What are the SA findings at this current stage?		<ul style="list-style-type: none"> The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
Part 3	What happens next?		<ul style="list-style-type: none"> A description of the monitoring measures envisaged

Table B: Interpreting Schedule 2 and linking the interpretation to the report structure

Schedule 2	Interpretation of Schedule 2	
The report must include...	The report must include...	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level	
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'baseline'?</i>
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

Table C: 'Checklist' of how and where (within this report) regulatory requirements are reflected.

Regulatory requirement	Information presented in this report
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report. The outcome of scoping was an 'SA framework', which is presented within Section 3.
c) The environmental characteristics of areas likely to be significantly affected;	The SA scope – in terms of key sustainability issues and objectives, including accounting for evolution of the baseline without the plan – is then discussed within the appraisal sections as appropriate, i.e. in light of the options and proposals that are a focus of the appraisal.
d) ... environmental problems which are relevant... ...areas of a particular environmental importance...;	
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presented a detailed context review and explained how key messages from this (and baseline review) fed into the 'SA framework', which is presented within Section 3. Also, information on the SA scope is presented as part of appraisal work in Sections 6 and 9. With regards to explaining " <i>how... considerations have been taken into account</i> ", Section 7 explains reasons for supporting the preferred option, i.e. how/why the preferred option is justified in-light of alternatives appraisal.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 6 presents alternatives appraisal findings in respect of reasonable growth scenarios, whilst Section 9 presents an appraisal of the Local Plan as a whole. All appraisal work naturally involved giving consideration to the SA scope and the various effect characteristics.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan...	Section 9 presents recommendations but perhaps more importantly flags 'tensions' that can be a focus of further work ahead of plan finalisation.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5 deal with 'reasons for selecting the alternatives dealt with', with an explanation of reasons for focusing on growth scenarios / certain growth scenarios. Section 7 explains 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of the alternatives / scenarios appraisal. Methodology is discussed at various places, ahead of presenting appraisal findings.
i) ... measures envisaged concerning monitoring;	Section 11 presents this information.
j) a non-technical summary... under the above headings	The NTS is presented separately.
The SA Report must be published alongside the draft plan, in-line with the following regulations	
Authorities... and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan...	This Interim SA Report is published alongside the Draft Local Plan in order to inform the consultation and then subsequent plan finalisation.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5 [and] the opinions expressed pursuant to Article 6... shall be taken into account during the preparation of the plan... and before its adoption or submission to the legislative procedure.	This Interim SA Report will be taken into account when finalising the plan for publication (see Section 10).

