

# Non-technical summary of the Interim SA Report published as part of the Southend Local Plan “Preferred Approach with Options” consultation (July 2025)

Southend City Council is currently preparing a new Local Plan that 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. Two consultations have been held to date and the current consultation is on a “preferred approach with options”. The consultation is held under Regulation 18 of the Local Planning Regulations and the next stage will be to prepare the final draft (“proposed submission”) version of the Local Plan for publication under Regulation 19 followed by an examination in public.

An Interim Sustainability Appraisal (SA) Report is published with a view to informing the consultation and subsequent plan finalisation. The Interim SA Report is presented in three parts:

- **Part 1** – explains work that has been undertaken to explore **reasonable alternatives (RAs)** in the form of alternative approaches to growth, or ‘growth scenarios’. Specifically, work is explained to define RAs (Section 5), appraise RAs (Section 6) and then feed-back to the City Council in order to inform a final decision on the preferred growth scenario to take forward for consultation (Section 7).
- **Part 2** – appraises **the current preferred “preferred approach”** (essentially a Draft Local Plan).
- **Part 3** – explains **next steps**, i.e. work to prepare the Proposed Submission Local Plan.

Part 1 comprises the bulk of the Interim SA Report and is focused on appraising the preferred approach to housing growth against an alternative approach (collectively referred to as two ‘**growth scenarios**’). It is important to be clear that these two alternative growth scenarios are not only explored within the Interim SA Report but also feature as a central element of the main consultation document.

Appraising and consulting not only on the preferred approach to housing growth but also one or more alternatives is a crucially important exercise at the current time. This matter has already been a focus of two preceding consultations in 2019 and 2021, but it remains a key important matter to explore.

Specifically, that is the case because the emerging preferred approach involves the identification of sites / sources of housing land supply with a total capacity of circa 9,500 homes whilst Local Housing Need (LHN) amounts to circa 24,000 homes,<sup>1</sup> such that the effect is to generate **at least 14,500 homes unmet need** over the plan period.<sup>2</sup> This is a very significant level of unmet housing need, including because there is a lack of confidence regarding the potential for any of Southend’s neighbouring local authorities to assist by making provision for unmet need from Southend.

The scale of unmet need under the emerging preferred approach clearly dictates a need to focus on defining, appraising and consulting on one or more alternatives involving **higher growth** in order to reduce the gap between supply / the housing requirement and LHN, and so reduce unmet need.

<sup>1</sup> Local Housing Need (LHN) is calculated using the Government’s Standard Method. A new Standard Method was published in December 2024 and the effect for Southend was that annual housing need rose from 1,173 to 1,405 homes per annum.

<sup>2</sup> This is an ‘at least’ unmet need figure for two reasons: 1) unmet need is the difference over the plan period not between housing land supply and LHN but between the ‘housing requirement’ and LHN, and the housing requirement may need to be lower than the total supply as a contingency for unforeseen delivery issues; 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). The NPPF expects plan periods of 15 years from the point of plan adoption.

The next question is then specifically what higher growth scenario(s) to explore, and this question is a focus of Section 5 within the main report. Defining reasonable alternative (RA) growth scenarios is often a challenging task for Local Plans, but for Southend the task is relatively straightforward. Specifically, there is one higher growth scenario involving additional allocation of a strategic urban extension known as **Land North of Southend (LNOS)**.

The possibility of allocating LNOS has been under consideration for a number of years but must be a focus of consultation once again at this current stage, with a view to the Council then making a final decision. The case for allocating LNOS in order to reduce the gap to LHN / minimise unmet need is clear, but LNOS is highly challenging for a range of reasons, most notably: **A)** the land falls within the London Metropolitan Green Belt; **B)** delivering LNOS in a way that aligns with transport objectives is highly challenging; and **C)** there is a need for cross-border collaboration with neighbouring Rochford District and also Essex County Council (Southend is a Unitary Authority such that it falls outside of the County Council's administrative area). It is anticipated that LNOS could deliver between 4,000 and 5,000 homes in the plan period within Southend and so c.4,500 homes is assumed.

*Table A: The RA growth scenarios*

Growth scenario	Urban supply	Fossetts Farm	Land North of Southend	Total housing land supply
1) Preferred approach	8,300	1,200	-	9,500
2) Higher growth	8,300	1,200	4,500	14,000

Finally, there is a complicating factor in that Scenario 2 must be appraised with assumptions made regarding what if anything would be delivered within neighbouring **Rochford District**, recognising that the landowners / site promoters have proposed a comprehensive cross-border scheme to deliver around 10,000 homes and it could well be the case that a comprehensive cross-border scheme is needed in order to deliver the required infrastructure / realise growth opportunities in full. The baseline assumption must be that the emerging Rochford Local Plan does not support LNOS extending into Rochford, but there is also a need to factor-in an alternative assumption whereby the Rochford Local Plan does support LNOS extending into Rochford.

Section 6 of the Interim SA Report presents an **appraisal of the two RA growth scenarios** under the 'SA framework' which is essentially a series of sustainability topics / objectives (see Section 3).

With regards to Scenario 2 (Higher growth) the baseline assumption is that the Rochford Local Plan does not allocate growth at LNOS within Rochford, but additionally the appraisal considers the implications of an alternative assumption whereby the Rochford Local Plan does direct growth to LNOS with a view to delivering a comprehensive cross-border scheme (there are several different scenarios for LNOS in Rochford District in practice, but a single scenario is assumed as a pragmatic step).

Table B presents a summary of the RA growth scenarios appraisal in the form of an appraisal 'matrix' with a row for each element of the SA framework, a column for each of the two RA growth scenarios and a final column that 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. Within each row 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.

From Table B 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.

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.

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.

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 below indicates that, were it to be possible to assume support for LNOS extending into Rochford 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 and transport infrastructure uncertainties, but also noting landscape sensitivities.

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 B: Reasonable growth scenarios appraisal summary<sup>3</sup>

Topic	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?
	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

<sup>3</sup> 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.

Following the growth scenarios appraisal, Part 1 of the Interim SA Report concludes with a statement provided by officers in **response to the appraisal** (Section 7), which explains the Preferred Approach is considered to be suitably justified in light of the appraisal (despite certain drawbacks relative to the higher growth scenario, as evident from Table B), but there will be a need to make a final decision on spatial strategy / sites / supply and the housing requirement subsequent to the consultation.

Part 2 of the Interim SA Report then presents an **appraisal of the Preferred Approach** as a whole, recognising that the current consultation document not only presents a preferred approach in respect of spatial strategy / sites / supply but also in respect of development management (DM) policies.

The appraisal concludes as follows:

“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).

A significant negative or ‘moderate or uncertain’ negative effect is then concluded under four topics:

- 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 current 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.

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.

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 areas where viability is more challenging.

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.”

Finally, Part 3 of the Interim SA Report discusses **next steps**, namely work post consultation to finalise the Local Plan for publication under Regulation 19 and then submission to Government followed by an examination in public. The formally required SA Report will be published alongside the Local Plan at the Regulation 19 publication stage, essentially aiming to discharge the key requirement set out in the legislation, which is to present an appraisal of the plan and reasonable alternatives.