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Sustainability Appraisal (SA) of the Southend Local Plan

SA Report

October 2026

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Quality information

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Non-technical summary

This report appraises: A) the Proposed Submission Local Plan; and B) reasonable alternatives.

Beginning with reasonable alternatives, Part 1 of the report is structured as follows:

- Section 5 – defines reasonable alternative 'growth scenarios'
- Section 6 – appraises the defined growth scenarios
- Section 7 – explains the Council's reasons for supporting the preferred scenario.

Ultimately two growth scenarios are defined in **Section 5**:

- **Scenario 1** – 9,800 homes total supply to 2045
- **Scenario 2** – scenario 1 plus Land North of Southend (LNOS) = 14,700 homes total supply to 2045

The context is as follows:

- Scenario 1 – broadly aligns with the preferred approach that was published for consultation in 2025, involving growth in the urban area plus modest Green Belt release at Fossetts Farm.
- Scenario 2 – this would involve additionally allocating all of the Green Belt within Southend that is 'reasonably' in contention for allocation (there is one Green Belt omission site, namely Site CA001, but it is ruled out). Specifically, LNOS would deliver a circa 4,900 home strategic urban extension to include a range of non-housing uses and onsite infrastructure including primary schools, a secondary school, a health centre, sustainable transport infrastructure and strategic greenspace.

The appraisal in **Section 6** concludes as follows:

> Table A presents a summary of the growth scenarios appraisal. This is in the form of an appraisal 'matrix' with a row for each of the sustainability topics that together comprise the SA framework and a column for each of the growth scenarios. For each sustainability topic the aim is to both: 1) rank the scenarios in order of preference; and 2) conclude on significant effects.
>
> Scenario 1 is the preferable scenario under only two topics, which is an indication that it potentially performs poorly overall. However, it is not the aim of this appraisal to reach an overall conclusion on which scenario performs best overall, because the appraisal is undertaken with no assumptions made regarding the degree of importance ('weight') that should be assigned to each of the topics in the planning balance. Rather, it is for the Council to assign weight to topics, consider and potentially question topic-specific appraisal conclusions, factor in additional issues/impacts as necessary, and then conclude on which scenario best represents sustainable development on balance.
>
> The introduction of LNOS in Scenario 2 brings benefits because it: A) would reduce unmet housing need to ~13,400 homes; B) represents an opportunity to deliver homes alongside new infrastructure rather than relying on enhancing existing infrastructure, which has been case in recent years and brings with it major challenges; C) can deliver a large proportion of family and affordable homes; D) can provide new employment land; and E) is fairly unconstrained in some environmental respects, notably in terms of biodiversity and the historic environment and arguably water.
>
> Also, without allocation of LNOS: A) major unmet housing need of ~18,300 homes would then lead to pressure for growth elsewhere in a constrained sub-region; B) the Southend Local Plan could risk being found unsound such that it cannot be adopted; and C) there would be a risk of LNOS coming forward anyway in a sub-optimal piecemeal manner.[1]
>
> However, there are infrastructure constraints, most notably in terms of transport given inherent constraints to growth in South East Essex. Detailed work has been completed, as reported across a suite of key studies prepared for the Local Plan (Transport Assessment, Infrastructure Delivery Plan and Viability Assessment), but there remains uncertainty regarding the delivery and timing of the required mitigation. There would also be infrastructure challenges under Scenario 1, including due to the viability challenges affecting urban redevelopment sites (particularly in lower viability areas within the City, where a significant proportion of growth is proposed); however, a headline consideration is in respect of the additional growth at LNOS under Scenario 2.

[1] A planning application for 2,000 homes was recently refused and at the current time we await the outcome of call-in and potential appeal. Also, land either side is anticipated to shortly be the focus of a 3,000 home application.

Also, it is important to be clear that LNOS is significantly constrained in terms of agricultural land, in that it comprises the primary area of higher quality (grade 2) agricultural land in South Essex, and it also comprises higher quality Green Belt, in that it is not classified as grey belt.

Finally, it is important to consider the context of potential growth within Rochford District, with latest understanding (Sept 2026) being that LNOS in Rochford may deliver 3,500 homes (1,650 by 2045) either side of Sutton Road, such that there would be two LNOS schemes (Southend and Rochford) separated by around 1km (Garon Park). Past work has explored potential comprehensive cross-border growth, to include a strategic sustainable transport corridor, but this would require additional growth in Rochford District. The Southend Local Plan cannot influence this, but the potential merits of comprehensive cross-border growth must be given ongoing consideration as far as possible.

***Table A**: Reasonable growth scenarios appraisal summary*[2]

Topic	**Scenario 1:** 9,800 homes	**Scenario 2** 14,700 homes
	Order of preference (number) and significant effects (shading)	
Accessibility (to community infrastructure)	2	1
Air quality	1	2
Biodiversity	2	1
CC adaptation	=	=
CC mitigation	=	=
Communities	?	?
Economy / employment	2	1
Equality	=	=
Historic env.	2	1
Homes	2	1
Landscape	=	=
Soils and resources	1	2
Transport	?	?
Water	2	1

[2] 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, '=' used where the scenarios perform on a par, and '?' used where it is not possible to reach a conclusion); 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 neutral effect.

With regards to **Section 7**, here officers provide the following text considering the appraisal:

"The sustainability appraisal has highlighted the merits/ opportunities and potential impacts of both Scenario 1 and 2, with both performing generally well in a number of respects and areas where adverse impacts can arise.

Scenario 2 generally performs better in terms of providing for more housing and employment floorspace. It closes the gap between Local Plan housing supply and LHN, albeit with significant remaining unmet needs, and enables the Local Plan to meet a more optimal economic floorspace need. LNOS has the ability to provide significant affordable homes, nearly twice as much as has been provided across the city over the past 20 years. LNOS will also provide for a high proportion of family housing, rather than primarily flatted development, which is a characteristic of urban brownfield development.

Further, LNOS has the ability to deliver additional and new infrastructure given improved viability compared to development of smaller brownfield sites and, importantly, the land to deliver such facilities, including new schools, a health facility, significant parkland and transport mitigation. The delivery of more and new infrastructure is a positive, but where this infrastructure becomes more costly and complex under Scenario 2 the risk to delivery becomes inherently greater, especially linked to phasing of the development. Indeed, the transport mitigation associated with mitigating LNOS are costly and in the case of widening Priory Crescent feasibly difficult, but the local plan evidence has indicated possible.

Scenario 2 results in a number of impacts that have been considered and weighed in the balance. This includes the loss of high-quality agricultural land, likely loss of mineral deposits subject to prior extraction and the loss of 9-hole golf course.

The allocation would also result in a loss of a significant proportion of the Green Belt in Southend and encroachment on the surrounding countryside. The Southend Green Belt Assessment (2026) found that most of LNOS is Green Belt and not Grey Belt. The NPPF (2024) notes that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period (Para 145) and Exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means. If that is the case, authorities should review Green Belt boundaries in accordance with the policies in the Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan (Para. 146).

The Southend Green Belt Assessment (2026) concluded that allocating LNOS would not fundamentally undermine the Green Belt purposes of the remaining Green Belt in the plan area. Although the development sites form a substantial part of the Green Belt land in Southend, the remaining Green Belt in the west, and a small proportion in the east of the city, would not be meaningfully impacted. Further, substantial Green Belt designation would remain in Rochford district which currently contains a large portion of the Southend city boundary.

Scenario 1 limits the main impacts of Scenario 2 in that it does not result in the loss of significant Green Belt land elsewhere in Southend, encroachment of the countryside, loss of agricultural land, potential loss of mineral deposits and ensures investment within Southend remains focused towards urban areas, assisting regeneration. However, it results in even more significant unmet housing needs, less employment floorspace and jobs within the area. Scenario 1 will result in significantly less affordable homes and family housing being provided over the plan period whereas Scenario 2 is more likely to deliver family and affordable homes due to land availability and viability.

After detailed consideration of the evidence base and balancing the findings of the Sustainability Appraisal and other supporting documents, the Proposed Submission Local Plan reflects Scenario 2, and the intention is to invite representations in relation to legal compliance and soundness at the Regulation 19 stage of plan making, prior to submission for independent examination."

Part 2 of the report appraises the Proposed Submission Local Plan as a whole, which in practice involves recapping on the appraisal of Scenario 2 and layering on understanding of the development management (DM) policies that are proposed in order to ensure that growth is delivered effectively.

The appraisal finds that the plan as a whole performs as per Scenario 2, namely that there will be a clear positive effect in terms of accessibility objectives and 'neutral' effects in terms of a number of sustainability topics, but that there is a risk of negative effects in terms of sustainability objectives relating to climate change mitigation, homes, transport and agricultural land.

Beginning with LNOS, the current Southend LNOS proposals are encouraging in terms of what can be delivered on and off-site, including 45% affordable housing, but there are uncertainties ahead of further work on costs / viability, and there should be ongoing scrutiny ahead of plan finalisation to ensure, as far as possible, that issues will be addressed opportunities realised. Specific matters for ongoing consideration include: A) phasing and its implications for infrastructure and viability; B) future proofing accounting for potential LNOS in Rochford and the ongoing possibility of a comprehensive cross-border scheme; C) the affordable housing mix (i.e. the proportion of social housing, again with viability implications); and D) the possibility of requiring a net zero carbon development, albeit this is acknowledged as likely not possible given viability parameters and competing cost priorities.

With regards to wider aspects of the plan, this essentially amounts to: 1) a new community at Fossetts Farm for 1,350 homes (part permitted); 2) a total of 5,450 homes from urban allocations (including permissions for circa 3,500 homes), with a primary focus on the city centre; 3) a windfall assumption of 3,000 homes (informed by an Urban Capacity Study); and 4) development management (DM) policies that will be used to judge planning applications.

With regards to the proposed housing supply from the urban area, the first point to note is that there are inherent uncertainties regarding a number of sites, in terms of: A) delivery (in particular four sites for a total of around 500 homes that are not allocations but 'opportunity sites'); B) site capacity and use mix; and C) the timing of when sites will come forward within the plan period. Secondly, the overall housing mix across many of these sites will be weighted towards flats in a way that does not align with the established need for family homes. Thirdly, the great majority of urban allocations are brownfield such there are inherent viability challenges, and a significant proportion of growth is proposed to come forward in parts of the urban area where viability is particularly challenging, most notably the city centre.

These points serve to highlight the importance of LNOS. Also, these points serve to highlight the importance of carefully considering the DM policy requirements that are placed on challenging urban sites, in terms of: A) striking a balance between competing policy priorities within viability parameters; B) ensuring that the cumulative burden of DM policy requirements does not risk impacting site deliverability; and C) ensuring that DM policies do not lead to false comfort, including regarding affordable housing and funding for infrastructure from CIL and S106. Compromises can and often are made at the planning application stage in light of viability evidence, and there is also the context of the new NPPF (2026) in terms of 'national DM policies' and a 'default yes' in urban areas.

It follows that the Viability Study (2026) is a key source of evidence, and a key conclusion is that whilst schemes involving housing are broadly viable (including assuming 30% affordable housing): *"The viability position for flatted development within [the lower viability area, where most new homes are set to be delivered], most specific within and surrounding the city centre, is more challenging. Weaker results are generally associated with smaller schemes, higher-density developments exceeding six storeys and mixed-use schemes incorporating significant commercial floorspace… Build to Rent (BtR) development generally performs more strongly than equivalent for-sale apartment schemes, which may provide an alternative form of apartment development within the city centre."*

Part 3 of the report discusses next steps. Specifically, the next step is to consider representations received and implications for soundness. Assuming that the plan can still be considered 'sound' it will then be submitted for Examination in Public (EiP) alongside a summary of the issues raised. It is important to be clear that there will not be the potential to make amendments to the plan (although modifications can be suggested as part of the submission material and indeed through the examination). The EiP will be overseen by one or more Planning Inspectors, and there will inevitably be a consultation on 'main modifications' in order to address matters of plan soundness. Once found to be sound following EiP the Local Plan will be adopted and then implemented, monitored and evaluated. At this stage a number of matters that might be a focus of future monitoring efforts are suggested, essentially with a view to evaluating whether the plan delivers on policy priorities in practice.

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 the strategy for growth and change across Southend up to 2045, allocate sites to deliver the strategy and establish policies against which planning applications will be determined.

1.1.3. SA is a process for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives.[3]

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 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 appraises "the plan and reasonable alternatives". The aim of the report is to inform consultation and then plan finalisation.

1.2.3. More specifically, the SA Report must answer the following **three questions**:[4]

- What has Plan-making / SA involved up to this point?
  - including appraisal of 'reasonable alternatives'
- What are the SA findings at this stage?
  - i.e. in relation to the draft plan
- What are next steps?

1.3. This SA Report

1.3.1. The final draft ('proposed submission') version of the Local Plan is currently published under Regulation 19 of the Local Planning Regulations (2012) and the Regulations set out that the SA Report should be published alongside. This SA Report supersedes the Interim SA Report published as part of Regulation 18 consultation in 2025.

1.3.2. The aim of this report is to inform 'representations' on the Proposed Submission Local Plan and then plan finalisation (see discussion of 'next steps').

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 report is structured so as to answer each of the **three questions** introduced above in turn. Specifically, the questions are answered across three 'parts' of the report.

1.3.5. Before answering the first question there is a need to further set the scene by discussing the scope of the plan (Section 2) and the scope of the SA (Section 3).

[3] 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, 2021). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document.

[4] See **Appendix I** for further explanation of the regulatory basis for presenting certain information within the SA Report.

2. The plan 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.[5]

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. Lack a 5YHLS means that planning applications must be determined under the 'presumption in favour of sustainable development', which has been an issue locally over recent years. Specifically, '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 it then being permitted at appeal ('planning by appeal').[6]

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."*[7]

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. *not* under 'the presumption'.[8]

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.
- 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 and planning strategically for green and blue infrastructure and planning for climate change mitigation and resilience.

[5] A number of other development plan documents have been adopted by the Council since the Core Strategy, including the Development Management Document and Area Action Plans for Southend Central Area, and for London Southend Airport.
[6] 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.
[7] The 2024 version of the NPPF applies for the purposes of preparing the Local Plan, on the assumption that the plan is submitted to the Government for examination by 31st December 2026, but the new 2026 version of the NPPF, which was published in August 2026, now applies for the purposes of decision-making, i.e. determining planning applications. It includes significant changes to the presumption in favour of sustainable development, including a new 'permanent presumption' within urban areas (see Policy S4).
[8] There is also an urgency because the Government has set a deadline of 31st December for local plans to be submitted under the current Regulations, such that if this deadline is missed the Council would have to 'start again' under new Regulations.

2.3. The plan area

2.3.1. Southend is a unitary authority located at the south east extent of Essex. Southend links very closely to Rochford District to the north and Castle Point Borough to the west, and the three authorities together form South East Essex. There is also a wider informal South Essex sub-region, which also includes 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. Rail connectivity is overall good, but road connectivity is highly 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.

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 military ties.

2.3.5. A total of nine neighbourhoods are defined across the urban area, and then to the north is an 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 rail 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 of 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 and lack of available land 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. Also, taller buildings face viability challenges due to new building regulations.

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" (as stated at para 1.1 of the current plan document).

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*

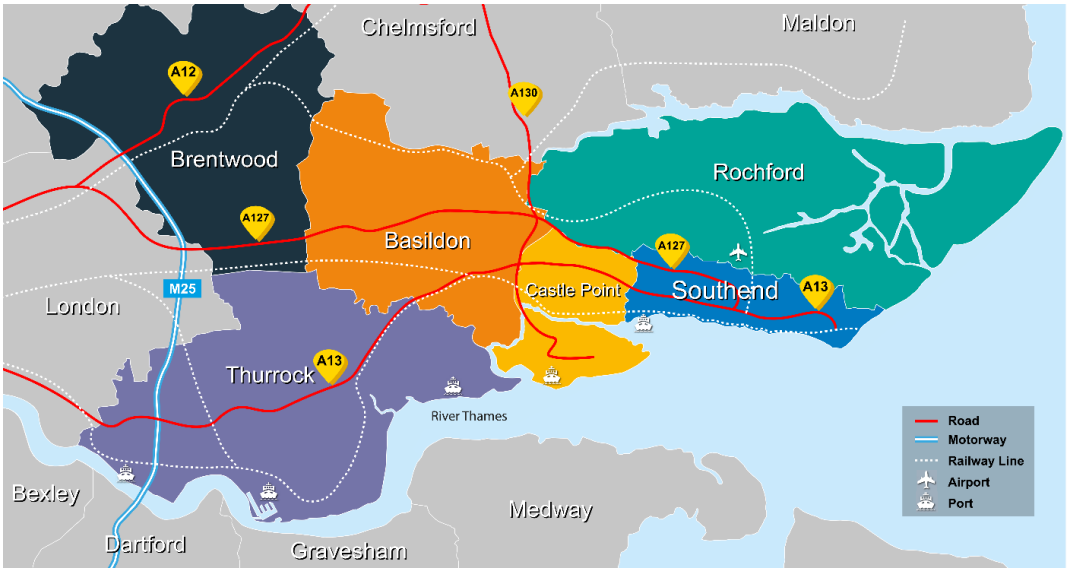


***Figure 2.2**: The City centre, other centres, employment areas and retail parks*

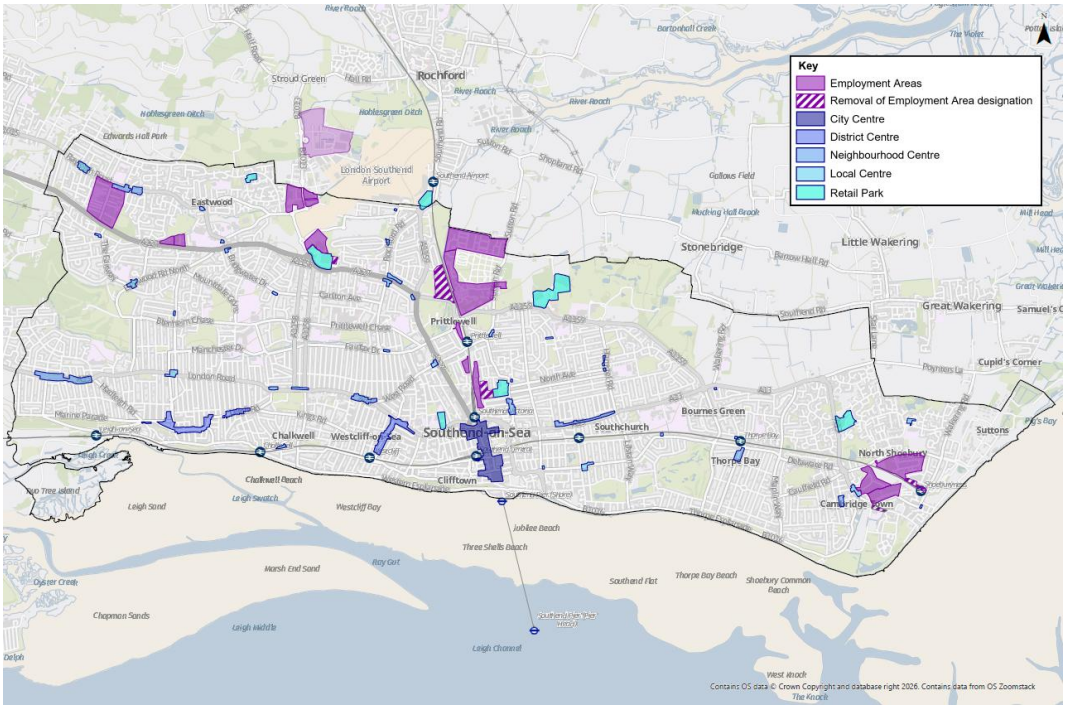


***Figure 2.3**: The defined neighbourhoods within Southend*



2.4. The plan period

2.4.1. The plan period is 2025 to 2045, in light of NPPF paragraph 22 which states: *"Strategic policies should look ahead over a minimum 15 year period from adoption... 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'), it is standard practice to set the start of the plan period as close as possible to the point of plan publication/submission, and specifically at the most recent date for which monitoring data is available showing the number of unbuilt homes with planning permission, which for Southend is 1st April 2025. The previous proposal was for the plan period starting in 2023, and delivery over the two years between 2023 and 2025 was far below Local Housing Need (LHN), as understood from the Government's standard method, which is the key 'target' that the Local Plan is tasked with meeting (as discussed below); however, past supply shortfalls are captured by the uplift for affordability that forms part of the standard method.

2.4.3. With regards to the plan end date, 2045 reflects the fact that the Local Plan includes a strategic urban extension known as Land North of Southend (LNOS), as discussed further below. LNOS will deliver in the longer term, and so a plan period to 2045 is necessary to capture delivery. Also, a number of urban sites are not expected to deliver until post 2040.

Existing commitments

2.4.4. It is worth noting here that, as of the start of the plan period (1st April 2025), there are approximately 3,500 homes set to come forward at sites with planning permission, and certain other sites are already to some degree committed given past plans. In turn, a key Local Plan aim is to identify a supply of land over-and-above 'existing commitments'.[9]

2.5. Plan objectives

2.5.1. It is important to define plan objectives to guide the plan-making process, and plan objectives are a key input to the SA task of defining reasonable alternatives (Section 4).

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."

2.5.3. The Vision also prioritises: safe and thriving communities; bustling high streets and business spaces; leisure and creativity; clean, green and proud.

2.5.4. Drawing upon this, the Local Plan vision to 2045 is:

"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."

2.5.5. The following plan objectives then aim to build on the vision and guide plan-making:

[9] Specifically, in respect of housing, the aim is to identify housing supply over-and-above completions and commitments (also a windfall assumption) via 'site allocations'. More specifically, the requirement is for specific "deliverable sites" for years 1 to 5 of the plan period (such that there is a 5YHLS); "developable sites or broad locations" for years 6-10; and "where possible" developable sites or broad locations for years 11-15. As well as demonstrating a 5YHLS of deliverable sites at the point of plan adoption (N.B. the 5YHLS calculation involves adding either a 5% or 20% buffer on top of the housing requirement) there is also a need to ensure that the Council can maintain a rolling 5YHLS over the early years of the plan period (ahead of a supply boost through a new plan).

- **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 assessment of reasonable alternatives and the emerging plan. It does not refer to the scope of the plan (discussed above) or the scope of reasonable alternatives (discussed below). The aim here is to introduce the reader to the *broad* scope of the SA, rather than trying to define the SA scope comprehensively, as there is a need for flexibility to respond to evidence and the scope of the plan / reasonable alternatives, with a view to avoiding generic / poorly targeted discussion. The SA scope is further discussed throughout this report as appropriate, i.e. throughout the report there is evidence-based discussion of key issues / objectives.

Consultation on the scope

3.1.2. The statutory consultation bodies were consulted on the Scoping Report in 2017 and all responses received have been taken into account. Comments on the SA scope were encouraged through the Draft Plan / Interim SA Report consultation in 2025.

The SA framework

3.1.3. 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.

3.1.4. At the core of the SA framework are the following topics (N.B. the topics were adjusted in 2025, as discussed in Section 3 of the Interim SA Report published at that time):

- 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

EqIA

3.1.5. 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. Three consultations have been held to date under Regulation 18 (in 2019, 2021 and 2025), prior to this current Regulation 19 'publication' stage. 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 2026. 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…"*

4.2. Reasonable alternatives in relation to what?

4.2.1. 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 housing needs (**LHN**), as far as possible, alongside delivering-on wider plan objectives. Establishing a spatial strategy is invariably a central objective of any local plan.

4.2.2. Alternatives in respect of spatial strategy / site selection / supply can be referred to as **'growth scenarios'**, and can also be thought of as **alternative key diagrams** (where the key diagram is a required spatial summary). A focus on RA 'growth scenarios' ensures a focus on mutually exclusive alternatives that go to the very heart of the plan and, in turn, ensures a meaningful and engaging appraisal in support of effective consultation.[10]

What about broad spatial strategy?

4.2.3. Broad spatial strategy feeds into the definition of growth scenarios, and so is a focus of discussion in Section 5.2. However, at this stage in the process there is no requirement to appraise broad spatial strategy alternatives because there must be a focus on alternatives that are genuinely reasonable given known supply options and the available evidence base.

What about individual sites?

4.2.4. Individual site options invariably generate a high degree of interest, but they are not RAs where the objective of a local plan is to allocate a *package* of sites to deliver in combination. Nonetheless, consideration is naturally given to the merits of individual site options as part of the process of establishing growth scenarios – see Sections 5.3 and 5.4.

4.2.5. There is also the matter of policy for individual sites, e.g. in terms of capacity and use mix, and this is a matter that is discussed further below in Sections 5.2, 5.3 and 5.4.

What about DM policies?

4.2.6. The plan also covers development management (DM) policies, but it is clear that spatial strategy / site selection / supply is the central matter. DM policies are appraised in Part 2 and, as part of this, informal consideration is given to the question of RAs; however, through discussion it was determined that there are no DM policy RAs for formal appraisal.

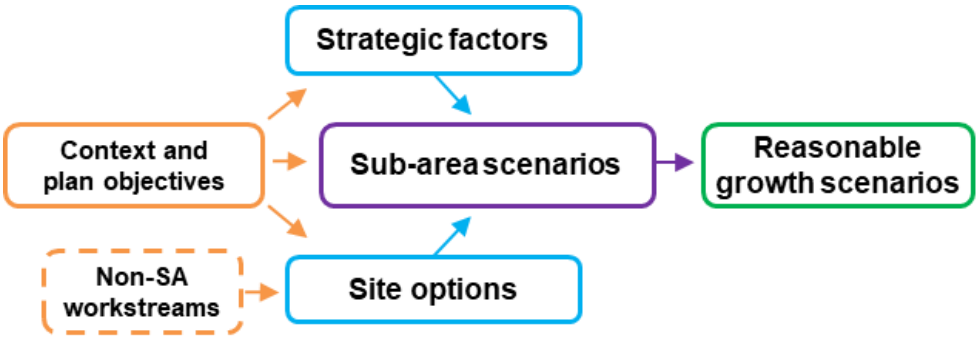
[10] SA must only focus on significant effects, and a focus on RA growth scenarios guarantees a focus on meaningfully differential significant effects thereby negating a need to 'screen' all plan policy areas/issues/choices. A further consideration is that the Regulations, when read at face value, arguably require consideration of alternative plans (specifically, the requirement is to appraise and consult upon: *"… the plan and reasonable alternatives"*), which supports a focus on RA growth scenarios. Finally, in respect of RAs, it is 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 significant effects are defined as effects *on the baseline*.

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 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 three 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/publication. There are many 'non-SA' workstreams (including as reported in other published reports) that are highly 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 28,100 homes over the plan period (2025 to 2045).

5.2.8. This is roughly four times the rate of development seen over the adopted Core Strategy period 2001 – 2021, and over the subsequent three monitoring years the number of net new homes delivered was 489, 341 and 173 homes respectively. Also, in 2025/26 it is anticipated that delivery from sites with planning permission will be only 212 homes, although supply from sites with planning permission is then set to increase to an average of just under 500 dpa over the subsequent four years, namely 2026/27 to 2029/30.

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 might be summarised as: A) a very densely developed but mostly low-rise 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 a recent Green Belt Assessment, GBA, confirms that most is *not* grey belt); and C) wider strategic constraints to growth 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:

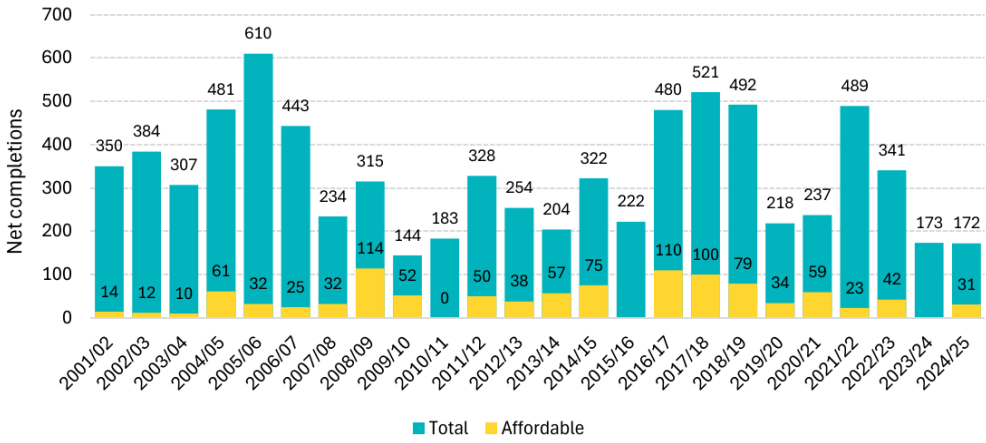
"… the application of policies in this Framework that protect areas or assets of particular importance [see footnote 7] provides a strong reason for restricting… development; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies 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 Labour Government's planning reform agenda, which includes a new emphasis on providing for LHN in full (and any unmet needs from elsewhere) wherever possible.

***Figure 5.2**: Market and affordable housing delivery (Lichfields, 2026)*



5.2.15. The final question is then whether there is a high-level case for exploring the possibility of a housing requirement set above LHN. However, in the case of Southend it is clear that this is not a feasible possibility, in light of the discussion above regarding constraints / barriers to high growth. The context of the preceding 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 scenario considered working with neighbouring authorities to meet unmet needs arising in Southend..
- Refining the Plan Options (2021) – the RA growth scenarios were similar to those from 2019 but there was greater clarity on the possibility of Rochford District providing for unmet needs from Southend by supporting growth at Land North of Southend (LNOS).
- Preferred Approach with Options (2025; N.B. also referred to as the 'Draft Plan') – the preferred approach involved circa 9,500 homes supply over a plan period of 2023 -2040 in the context of LHN understood to stand at circa 24,000 homes (i.e. at least 14,500 homes unmet need). Additionally, a higher growth scenario was defined, appraised and consulted on (it featured in the plan document as well as the Interim SA Report published alongside) that would involve an additional circa 4,500 homes, within Southend, from LNOS.

5.2.16. In short, at all three 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.

5.2.17. 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 relevant for Southend.

5.2.18. 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. However, there is also a clear need to make every effort to minimise (or even close) the gap to LHN, including because there is little if any potential for unmet need to be provided for elsewhere in a constrained sub-region (and, indeed, unmet need is already an issue in the sub-region).

5.2.19. To end, Box 5.2 presents recent local plans examples of housing requirements below LHN.

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

Whilst the Duty to Cooperate was recently abolished it remains the case that there is a strong emphasis on "effective cooperation" within the 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. Notably, the NPPF states: *"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..."*

However, dealing with unmet need as part of local plan-making in the absence of a higher level strategy is very challenging, which is part of the motivation for Local Government Reorganisation (LGR) and devolution (including a new tier of sub-regional Spatial Development Strategies).

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 this unmet need being provided for elsewhere within the sub-region (ideally as close as possible to Southend).

The City Council has engaged with neighbouring authorities on a continuous basis regarding unmet need, but this has not led to any agreement on capacity to accept unmet need. Indeed, most neighbouring authorities have stated that they are unable to provide for Southend's unmet need.

However, the process must remain ongoing, and so the following bullet points provide an overview of the latest situation in respect of neighbouring local plans:

- 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 struggled to progress, and there was a need to 'go back to the drawing board' in 2025 after District's LHN increased by 75% under the new standard method. A Draft Local Plan was then published under Regulation 18 in early 2026, which proposed to set the housing requirement at LHN (i.e. provide for LHN in full) and was clear that the District would not additionally provide for unmet need from elsewhere. It consulted on LNOS within Rochford but without any assumptions made regarding LNOS within Southend (i.e. the southern and eastern part of LNOS).

  Importantly, an Interim SA Report was published as part of the consultation that presented an appraisal of the emerging preferred approach alongside alternative growth scenarios including a higher growth scenario that would involve supply sufficient to enable a housing requirement set above LHN, such that there would or could be scope to provide for a modest proportion of unmet need from Southend.

  Most recently (Sept 2026) a Regulation 19 version of the Local Plan has been made available for consideration by elected councillors but is yet to be agreed for formal publication. The housing requirement is set at LHN over the plan period but only on the basis of a heavily stepped requirement (370 dpa for the first 7 years and then 912 dpa for final 10 years). It proposes the western part of LNOS in Rochford only (north of Temple Farm Industrial Estate and east of Southend Airport;) and does not discuss the possibility of a comprehensive LNOS linking to potential growth areas in Southend. It also proposes land east of LNOS in Southend, namely land adjoining Shoeburyness.[11]

[11] As a further update, in late September 2026 Rochford Full Council made significant changes to the Local Plan, but the Minister for Housing Planning then issued a Holding Direction preventing publication of the plan. At the time of writing it is unknown whether the hold direction will be lifted or, alternatively, whether the Minister may take further action to intervene in the Local Plan.

- 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, LHN rose by 100% to 700 dpa and this is in the context of delivery of -58 homes in 2023/24 and 21 homes in 2024/25. Most recently, a Local Plan was published (Regulation 19) and then submitted for examination in public that does not propose any Green Belt release and, in turn, proposes a housing requirement set at 52% of LHN over the plan period, leading to unmet need. It is also noted that the housing requirement is heavily stepped and set precisely in line with supply (i.e. there is no supply 'headroom' as a contingency for delivery issues). An initial examination hearing session will be held in early September to discuss the housing requirement, with the Inspectors' agenda questioning whether: *"… any adverse impacts of providing for all or more of the area's objectively assessed housing needs… significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole?"*
- 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 dpa, and recent delivery over the three years to 2025 averaged only 244 dpa. The most recent situation is that a Local Plan was published under Regulation 19 in July 2026 following a Ministerial intervention, but an issue is that the Council's administration has stated that they do not support the plan. The plan period is to 2043 and the plan identifies 28,430 homes supply in the context ~25,200 homes LHN, but the council sees this supply headroom as necessary to ensure that a 5YHLS can be demonstrated at the point of plan adoption and then maintained over the early years of the plan. There is no discussion of unmet need in the plan document and the accompanying SA Report rules out higher growth as 'unreasonable'.
- 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 1,074 spa, but recent delivery over the three years to 2025 averaged only 338 dpa. The latest situation is that a Regulation 19 is agreed for publication that identifies 25,406 homes supply to 2044 in the context of an LHN figure of 21,480 homes. Also, the plan identifies 10,500 homes supply to deliver beyond the plan period. As such, the question arises as to whether there is scope to make provision for unmet need from Castle Point and potentially also Southend; however, this is not discussed as a possibility in the materials published to date, and the plan document explains that the aim is to deliver high housing growth in support of high jobs growth.
- Brentwood – a Local Plan was adopted in 2022, and a review has only recently commenced. The adopted housing requirement is 350 dpa, whilst the Borough's new LHN figure is 713 dpa, 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 and poor transport connectivity 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 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. Subsequently the Council held a focused consultation on additional sites with a view to enabling the housing requirement to be set at LHN, and a supporting housing topic paper explains: *"Our Local Plan evidence base and [SA, or 'IIA' as it is referred to] have extensively tested [options]. As such there is no capacity… to accommodate any unmet housing need..."* It can also be noted that there is a 'flat' housing requirement, as shown here, as opposed to a 'stepped' requirement whereby the requirement is lower in the early years of the plan period and then commensurately higher in the later years of the plan to allow complex sites time to deliver.
- 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 dpa in the context of delivery over the three years to 2025 averaging 415 dpa. There has been no evidence of progress since 2023 and, overall, there is little or no question of providing for unmet need from Southend.

***Box 5.2**: Select recent case-studies of housing requirements set below LHN*

- Three Rivers – the Secretary of State recent intervened to require that additional allocations are added to the Local Plan in order to boost supply and, in turn, the housing requirement. However, the effect of the supply boost is to allow the housing requirement to be set at around 77% of LHN, i.e. such that there is unmet need.
- Torbay – the Secretary of State recent intervened to require that information be submitted to demonstrate the evidence-based justification for a housing requirement set at 42% of LHN. However, no further action was then taken and the plan is now published under Regulation 19.
- Hastings – following publication of a Draft Local Plan in early 2026 the Secretary of State wrote to the Council stating a concern with the proposal to set the housing requirement at less than 27% of LHN and requiring further work to demonstrate no stone left unturned in terms of supply. The Minister explained that, if further work confirms a need to generate unmet need then the Council should work with neighbours to try and make provision for that unmet need and, after having done so, if it remains the case that there is unmet need then this will need to be robustly justified. The latest proposal (version agreed by Cabinet in September) sees a housing requirement set at 24% of LHN.
- Mole Valley – the Inspector's Report (2024) found a housing requirement set at 82% LHN to be sound, explaining:
  - "… the Council sought to balance the LHN against… constraints."
  - "[The requirement] is based on a thorough and robust assessment [of options]."
  - "[It] would be ambitious, almost doubling the target in the existing Plan."
- London – the adopted London Plan (2021) generated unmet need that has not been provided for, and now a Draft London Plan has been published (July 2026) that generates major unmet need, with supply over the first ten years falling ~300,000 homes below LHN and then no specific supply identified for the subsequent ten years.

Employment land

5.2.20. An Economic Needs Assessment (ENA, 2026) considers a range of scenarios for employment land floorspace needs (Table 5.1, below) before concluding as follows:

> "The quantitative and qualitative assessment concludes that there is a total requirement between 58,600 sq.m (11.2 ha) and 68,300 sq.m (13.6 ha), which is further distributed to:
>
> a. 25,600 sq.m (around 2.9 ha) of office space, which derives from Scenario 3B (Labour Supply, 735 dpa, including hybrid working patterns adjustment). This comprises the most balanced figure across the scenarios, is aligned with the housing need and provides a positive headroom to allow for future growth in the long term and against the weak market signals that currently occur in the area, without overestimating the future requirements.
>
> b. Between 33,000 sq.m (around 8.3 ha) and 42,700 sq.m (10.7 ha) of industrial (including light industrial) and distribution space, with the upper scale allowing for some further flexibility and considering the economic forecasting and the emerging market trends, while the lower scale is aligned with the housing delivery of 735 dpa."

5.2.21. In short, the recommendation is to deliver employment land in response to labour supply assuming that the housing requirement is set at 735 dpa (see further discussion below) whilst also remaining open to higher growth to reflect labour demand.

5.2.22. Scenario 3b (labour supply assuming a housing requirement set at 735 dpa) would generate 9,442 jobs over the plan period, whilst Scenario 1b would generate 11,052 jobs. In contrast, were the housing requirement to be set lower there could be a need to provide for employment land in line with Scenario 3a leading to growth of 3,879 jobs.

5.2.23. Further key conclusions from the ENA are as follows:

- "Future demand in the industrial and logistics sectors will more likely relate to the increasing population of the area and consequently to the need for space to accommodate last-mile and smaller-scale warehousing to serve the population, alongside flexible and hybrid industrial/warehousing space for SMEs."
- "The future employment potential of Southend will be influenced by a number of factors. In particular, there is currently reported to be some shortage of available industrial land and floorspace to meet the indigenous growth requirements of the commercial market, as well as to enable the necessary level of churn and upgrading of existing sites required to sustain a functioning industrial and warehousing property market."
- "Southend is a very constrained area where employment land has seen significant losses in recent years; however, the planning requirements should be in line with a positive plan-making process and should not overlook any potential opportunities for growth. In addition, the Council should consider introducing an Article 4 Direction to those well performing areas to ensure there will be no future loss and secure their future prosperity and economic function."

***Table 5.1**: Gross floorspace requirement scenarios, 2025 to 2045 (Lichfields, 2026)*

Type of Space/Use Class	Scenario 1A– Labour Demand	Scenario 1B– Labour Demand Changing Working Patterns in Office-Based Sectors	Scenario 2A – Past Development Rates	Scenario 2B – Net Absorption	Scenario 3A – Labour Supply 490 dpa	Scenario 3B – Labour Supply 735 dpa
Office - E(g)(i)/(ii)	52,200	32,800	-121,900	-16,455	11,580	25,600
Industrial - E(g)(iii), B2 and B8	42,700	42,700	-60,600	-700	14,870	33,000
Total	**94,900**	**75,500**	**-182,600**	**-17,200**	**26,500**	**58,600**

Source: Experian (2026) / Southend Council (2026) / CoStar (2026) / Lichfields analysis
Note, figures have been rounded and may not sum.

Conclusion on growth quanta

5.2.24. This section has considered housing needs and employment land needs in turn.[12]

5.2.25. 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 and, indeed, unmet need is already an issue in the sub-region.

5.2.26. With regards to employment land, the ENA identifies a minimum need figure but also identifies a potential higher need figure that the Council might aim to provide for.

5.2.27. 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.

[12] 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

5.2.28. The aim of this section is to explore 'broad spatial strategy' issues, opportunities and options, building upon key points already introduced above.

5.2.29. 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.

5.2.30. Specifically, there is a need to consider broad strategy in respect of:

- Maximising supply from within existing neighbourhoods; and
- Supply from elsewhere to minimise the gap to LHN.

Maximising supply from within existing neighbourhoods

5.2.31. This has been a key focus of work over recent years, given a long-standing recognition that it is likely not possible to set the Local Plan housing requirement at LHN, as discussed.

5.2.32. A starting point is Section 2.3 of the Refining the Plan Options (RPO) consultation document (**2021**), which presented a baseline urban supply scenario and then a higher growth scenario that would boost urban supply by 2,250 homes via an additional emphasis on: regeneration of Council owned housing estates (40 sites; 850 homes net); underused employment sites (4 sites; 750 homes); two areas of agricultural land in the urban area (350 homes); and targeted development of urban greenspace (3 sites; 300 homes).

5.2.33. It is also important to note that Part 3 of the consultation document 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 urban supply).

5.2.34. Furthermore, an assessment proforma was presented for each urban site option, presenting analysis with a view to informing consideration of the options, i.e. the question of whether to allocate the site plus the question of appropriate development density and use mix.

5.2.35. Subsequently (**2022-2025**) detailed work continued to explore urban supply options (site selection, density and use mix), drawing upon consultation responses and technical workstreams (e.g. looking at design, infrastructure and development viability), and in the context of an evolving policy context, namely increasing pressure to maximise supply.

5.2.36. This background was explained within Section 5.2 of the Interim SA Report published alongside the Draft Plan in 2025, and then Section 5.4 of that report presented a discussion of all urban site options by neighbourhood, with a view to scrutinising the emerging proposed approach to urban supply and identifying any options for boosting supply.

5.2.37. The conclusion reached in 2025 was that there was no reasonable scenario involving a significant boost to urban supply; however, it is nonetheless the case that all urban site options are once again discussed in Section 5.4 of this report.

5.2.38. This is 'light touch' exercise, because the emerging preferred approach to urban supply 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, but significant choices are inherently limited given:

- 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.
- There are only 3 existing designated employment areas that are poorer performing such that they might be de-designated and all three are proposed to be redeveloped to deliver homes in the plan period (Grainger Road, Prince Close, Terminal Close).
- Site capacities are considered to be broadly maximised within reason on the basis of an iterative Housing and Economic Land Availability Assessment (HELAA) process.
- Whilst there are certain proposed urban allocations where the quantum of new homes remains open for discussion – given potential choices around density, layout and use mix – these choices are at the margins / of limited significance (even in combination).

5.2.39. The emerging **preferred supply from within existing neighbourhoods** 8,450 homes over the 20 year plan period, which is slightly higher than the equivalent figure from 2025 (8,300 homes, although this partly reflects a plan period that is two years longer), but lower than the maximum figure from 2021, which involved 12,850 homes over 21 years.

5.2.40. The 8,450 homes supply from within existing neighbourhoods breaks down as:

- 3,600 homes in Southend Central (down from 4,000 in 2025)
- 1,850 homes in neighbourhoods (down from 1,900 in 2025) (inc. 700 in Shoeburyness)
- 3,000 homes from windfall ('a windfall assumption') (up from 2,400 in 2025)

5.2.41. Further points to note are:

- More than half of the supply from the first two bullet points comes from sites that already have planning permission, as discussed further in Section 5.4.
- Across the first two bullet points, 586 homes comes from sites that are 'opportunity sites' on the basis that delivery is uncertain, e.g. due to existing uses onsite.
- The windfall figure has been carefully considered, accounting for both past trends and a detailed 'bottom up' analysis of development typologies through an Urban Capacity Study.

5.2.42. Ultimately, the proposed approach is considered suitably proactive, e.g. average delivery of 423 dpa (8,450 / 20) would be at the top end of recent rates of total delivery (Figure 5.2 above; N.B. 99% of homes delivered over the past 20 years have been on brownfield sites), and recent supply has involved a high proportion of flatted development.

5.2.43. 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.

Supply from elsewhere to minimise the gap to LHN

5.2.44. Having accounted for 8,450 homes supply from within existing neighbourhoods there is a supply shortfall of *at least* 19,650 homes (28,100 – 8,450) if the housing requirement is to be set at LHN, such that the Local Plan does not generate unmet need.[13]

5.2.45. 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 that would deliver an urban extension to Fossetts neighbourhood and to the west of Garon Park. The land is already safeguarded for development, two of the sites have planning permission (one is under construction but has faced delivery issues) and a third site is small and not in the Green Belt. The final site is the largest component 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. This latter site has a capacity of 966 homes and is well-located in wide-ranging respects. Its delivery can secure a comprehensive development in combination with the other three sites and, in turn, ensure development of a high quality 'infrastructure led' new community.

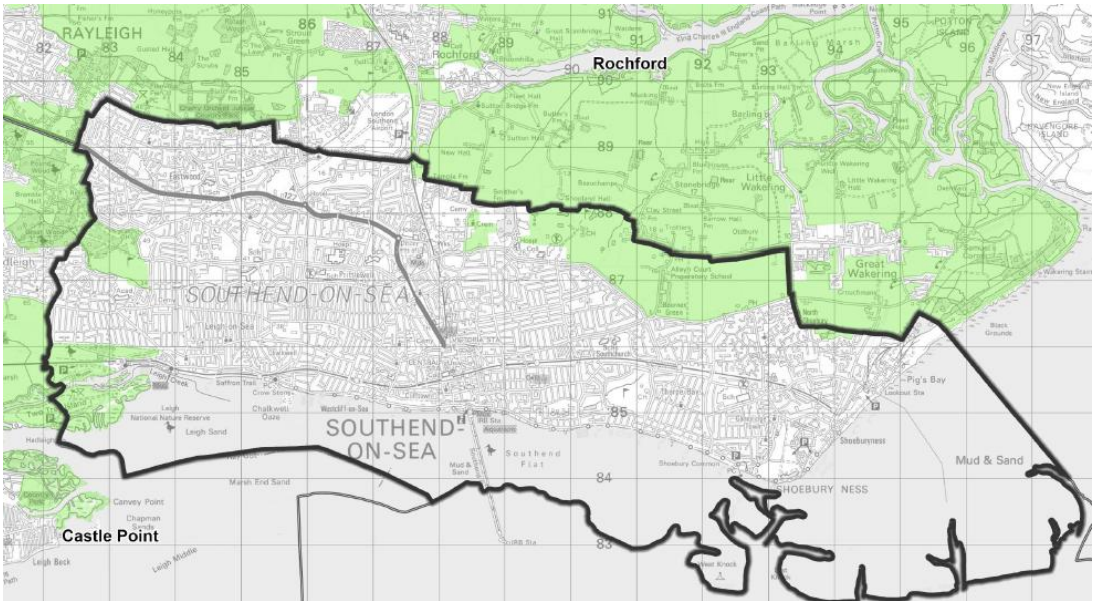
5.2.46. This discussion leads to a conclusion that supply from Fossetts Farm can reasonably be taken forward as a 'constant' across the RA growth scenarios (as per urban supply). In short, this is 'reasonable' given strategic factors (a need to reduce the gap to LHN) in combination with local / site-specific factors (including the safeguarded status).

5.2.47. Total supply from Fossetts Farm is 1,350 homes which reduces the supply shortfall to at least 18,300 homes (28,100 – 8,450 – 1,350).[13]

[13] This is an 'at least' figure for two reasons. Firstly, there is a need to acknowledge the uncertainty associated with the 484 homes supply from opportunity sites. Secondly, there can be a need for a total supply in excess of the housing requirement, i.e. a supply 'headroom' as a contingency for delivery issues, particularly where the supply involves complex sites such as urban regeneration sites and/or large scale strategic sites. In particular, there is a need for a supply headroom over the early years of the plan period with a view to ensuring that the Council can maintain a five year housing land supply as measured against the housing requirement, and accounting for the need to apply either a 5% or a 20% buffer as part of the five year housing land supply calculation.

5.2.48. 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)**. Figure 5.4 shows Green Belt in full, but parcels to the west are subject to clear constraints.

***Figure 5.4**: Green Belt in Southend*



5.2.49. LNOS within Southend comprises broadly the eastern two thirds of the primary area of Green Belt to the north of Southend, where the western circa one third is Garon Park.

5.2.50. Options have been considered since 2019, including within the Interim SA Report (2025), and latest understanding is that LNOS within Southend could deliver 4,900 homes within the plan period to 2045 alongside a range of other uses and offsite infrastructure upgrades.

5.2.51. LNOS is a proposed allocation at the current time, such that the current plan identifies a total supply of 14,700 homes (8,450 + 1,350 + 4,900) and generates an unmet need of at least 13,400 homes (28,100 – 14,700). However, there also clearly remains a need to continue to test the alternative of not allocating LNOS, i.e. an approach as per that proposed at the Draft Plan stage in 2025. This is discussed further below in Section 5.4.

5.2.52. Finally, there is the possibility of strategic choices in respect of: 1) the quantum of growth; and 2) planning for LNOS Southend accounting for LNOS in Rochford.

5.2.53. In respect of (1), there is one part of the main area of Green Belt to the north of Southend that is available but not proposed for allocation as part of LNOS, as discussed further in Section 5.4. In short, this is the sole 'omission site' in the context of the Local Plan.

5.2.54. In respect of (2), the latest understanding (Sept 2026) [14] is that the emerging Rochford Local Plan may allocate Green Belt land directly to the east of Southend Airport and north of Temple Farm Industrial Estate (land either side of Sutton Road) to deliver circa 3,500 homes (1,650 homes by 2045), which essentially means allocating the western extent of the broad cross-border area that has been discussed as 'LNOS' over recent years. The effect would be that LNOS in Southend and Rochford comprise two separate schemes, separated by around 1km (Garon Park). The Southend Local Plan cannot influence LNOS options in Rochford, but must account for them as far as possible.[15]

[14] A version of the Rochford Local Plan was published as part of the agenda for a meeting of the Planning Policy Committee on 4th September 2026. The plan remains subject to change (as discussed above), but there is little reason to suggest changes involving allocation of additional land to expand LNOS in Rochford to the east, including as this land would likely deliver beyond 2045.
[15] Also, at the time of writing the Rochford Local Plan may allocate a 950 home allocation a short distance to the east of LNOS in Southend, namely a site that would extent Shoeburyness towards Great Wakering. There is also a pending planning application.

5.2.55. Also, there is a need to consider the ongoing *possibility* of a comprehensive cross-border LNOS with Garon Park at its heart and a new east west sustainable transport corridor linking from Shoeburyness to Southend Airport Station via a new bridge over the railway / Prittle Brook. This is no longer an option for consideration in the context of the Southend Local Plan at this advanced stage (and recalling the need for the Local Plan to be submitted by 31st December 2026), because it would require additional land to be allocated in Rochford District.[16] However, it has been explored in detail over recent years,[17] and remains an important ongoing consideration, as discussed further below.

Conclusion on broad spatial strategy

5.2.56. The situation is relatively straightforward, in contrast to many other local plans:

- Within existing neighbourhoods – there is limited case for questioning the proposed 8,450 homes supply (inc. windfall). However, matters are discussed further in Sections 5.4.
- Fossetts Farm – 1,350 homes can be assumed, as explained above.
- LNOS – a comprehensive cross-border scheme is now ruled out, such that the key question is simply whether or not to support LNOS within Southend. The proposed approach is 4,900 homes but matters are discussed further in Section 5.4.

5.3. Site options

5.3.1. Here there is typically a need to discuss detailed workstreams that have explored site options leading to a shortlist of sites to discuss further in Section 5.4.

5.3.2. However, Southend is not a typical situation, in that all of the site options that need to be discussed in Section 5.4 have already been introduced, namely: 1) the preferred sites within existing neighbourhoods; 2) the four Fossetts Farm sites; and 3) the LNOS sites.

5.3.3. To reiterate, the HELAA is a key workstream that has led to the identification of sites for allocation and the proposed approach to capacity / use mix in each case. The HELAA is informed by other workstreams including an Urban Capacity Study (which also informs the proposed windfall supply) and studies examining employment land needs and supply.

5.4. Sub-area scenarios

Introduction

5.4.1. The next step is to bring together 'top down' understanding of strategic factors (Section 5.2) and 'bottom up' understanding of site/supply options (Section 5.3) in order to identify combinations of site/supply options ('scenarios'). This is typically a highly challenging aspect of local plan-making, such that it is important to break the task down by considering scenarios by sub-area. This is less the case for Southend, but it is nonetheless helpful to explore combinations of site/supply options by sub-area ('sub-area scenarios').

5.4.2. There are nine established neighbourhoods (including Fossetts, which is proposed to be extended via Fossetts Farm) and then a tenth sub-area for discussion is LNOS.

[16] It is also the case that there are major challenges in respect of planning for a comprehensive cross-border LNOS in the absence of a higher level plan to guide the process (Rochford is also a two tier authority, i.e. such that Essex County Council is a third key party when considering any possible cross-border LNOS). In this regard, it can also be noted that whilst the proposal was for Southend City Council, Rochford District Council and Essex County Council to merge to form a single new unitary authority in 2028 under Local Government Reorganisation (LGR) the Government announced a pause to LGR in Essex on 7th September 2026.

[17] As part of this, within the Interim SA Report published alongside the Draft Local Plan in 2025, not only was the option of supporting LNOS within Southend tested as a 'reasonable alternative', but there was also a sensitivity test scenario that assumed LNOS delivered as a comprehensive cross-border scheme. Furthermore, the Draft Rochford Local Plan published for consultation in January 2026 presented comprehensive growth within the Rochford Part of LNOS as an emerging preferred option, with the potential for 4,000 homes (but only 1,500 homes in the plan period). This included the eastern part of LNOS in Rochford, which could clearly only come forward in combination with LNOS in Southend.

Eastwood

5.4.3. Figure 5.6 is taken from the current plan document and shows 2 site proposals:

- CA004 (Nestuda Way) – is Council owned land farmland but not Green Belt. It is clearly sensitive on account of the adjacent airport and given the site is in direct alignment with the runway, but the proposal is for commercial development.
- HEA130 (Land at Lundy Close) – is Council owned amenity greenspace and has planning permission for 9 homes (22/01214/BC3).

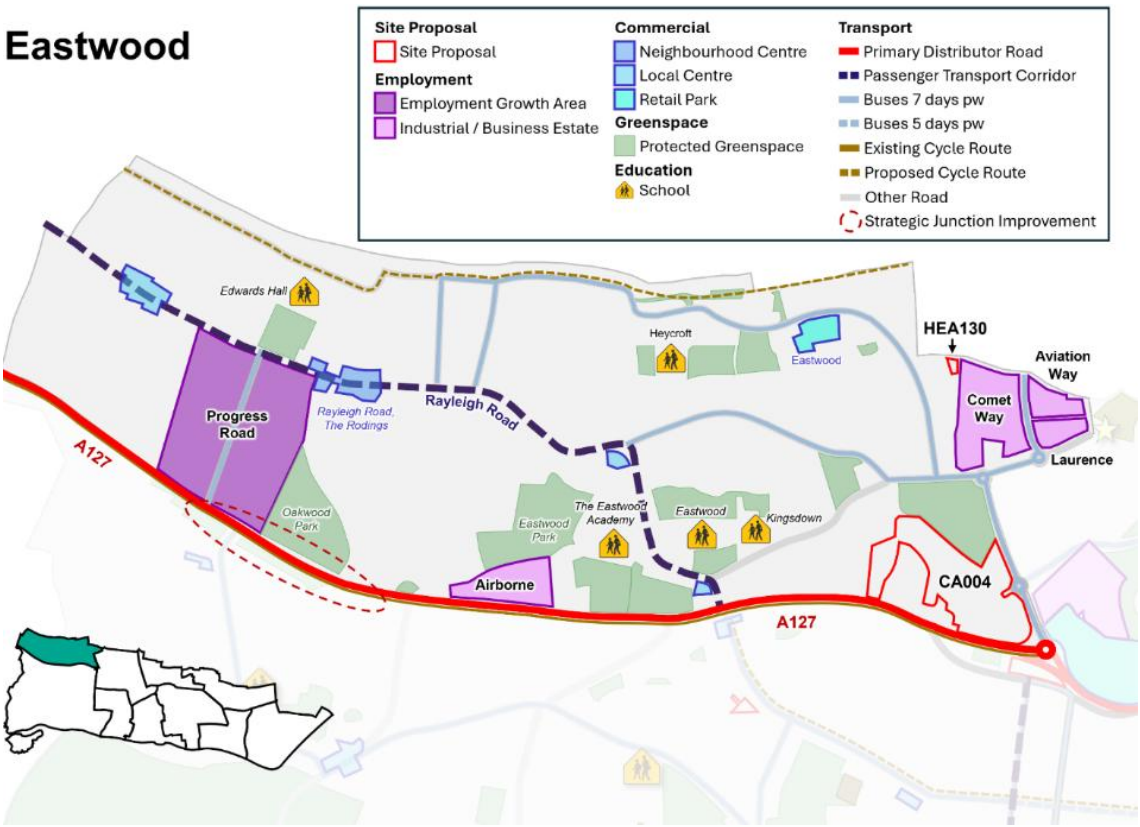
5.4.4. Proposals are unchanged from 2025 and there are no omission sites of note.

5.4.5. In conclusion, there are no omission sites and there are not known to be any options for boosting supply at any of the proposed sites, hence there is only one reasonable scenario.

5.4.6. Moving forward, whilst there is an established windfall assumption informed by the Urban Capacity Study (UCS), there will also be a need to give ongoing consideration to ways of proactively boosting growth, including potentially through a new local plan.

5.4.7. In this regard, Eastwood is not one of the better connected neighbourhoods, given distance to rail stations at Rayleigh and at Leigh-on-Sea, and given limited bus connections north-south, but there are potentially opportunities nonetheless. In particular, ongoing consideration might be 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 one or more of the local/neighbourhood centres, building on the 'complete communities' idea, focusing residential growth in sustainable locations with good access to retail, services and facilities, and public transport. Options could be explored in collaboration with Rochford District Council, recognising close links to Rayleigh Town Centre (where traffic is an issue).

***Figure 5.6**: Key diagram for Eastwood*



Leigh

5.4.8. Figure 5.7 shows 10 site proposals although 6 of these have planning permission. Focusing on the non-permitted sites:

- HEA069 (Former Car Showroom, 831-837 London Road; **39 homes**) – proposed for a mixed use residential development with commercial ground floor providing active frontage.
- HEA120 (843 London Road; **9 homes**) – previously permitted and now proposed for a mixed use residential development with commercial use at the ground floor.
- 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, retaining the locally listed façade.

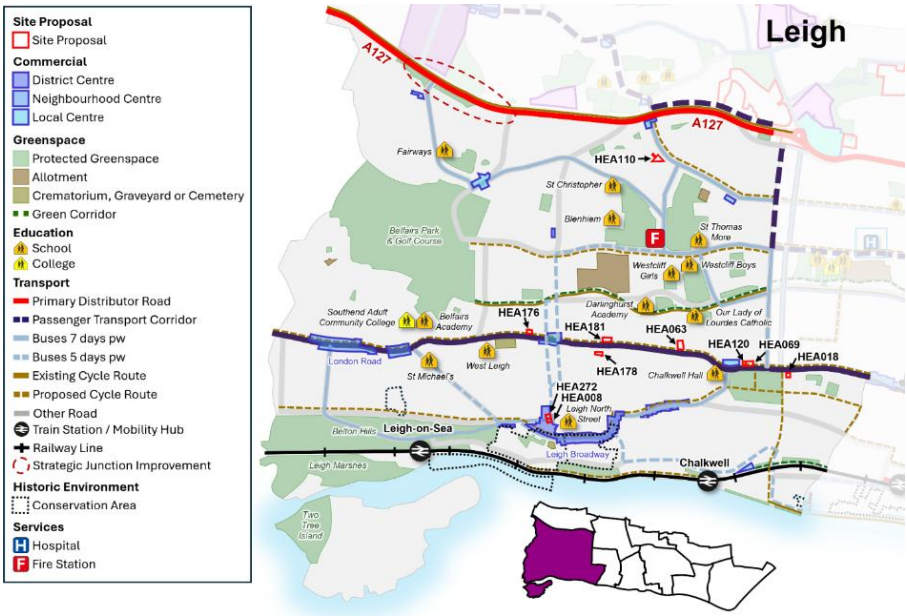
5.4.9. All 4 of these sites were proposed allocations in 2025, and for three of the sites capacity is unchanged. In respect of the largest of the sites (HE069) capacity is reduced from 52 homes in 2025; however, this is on the basis of detailed site-specific considerations and there is little reason to suggest that a higher capacity figure remains a clear option. The assumption is that the scheme would involve 4 or 5 storeys such that density is ~100 dph.

5.4.10. There are no omission sites of note and there are no clear options for boosting supply at any proposed sites. As such, and in conclusion, there is only one reasonable scenario.

5.4.11. Moving forward, consideration might be given to capitalising on the cluster of sites along the A13 London Road with a view to achieving a critical mass that could unlock local benefits, for example an improved bus service or new strategic transport infrastructure. This is a key corridor through South East Essex, and the UCS explains: *"Leigh south benefits from a wide range of services and facilities, with some 'gaps' in provision... The strategic transport corridor through Leigh is a sustainable location for exploring future growth potential [alongside] the delivery of urban greening (such as pocket parks) and town centre uses…"*

5.4.12. Also, the UCS identifies Leigh District Centre as a future growth opportunity, although: "*The surrounding areas are suburban in character… development should conserve and enhance the conservation areas... Tall building forms are unlikely to be acceptable…"* Also, it explains that: *"One of the main issues affecting… the more tightly planned terraced streets around the heart of the district centre, is pressure for on-street parking. Many of the residential properties have no off-street parking, and this is compounded by added car parking pressures arising from previous conversions of houses to flats, from the streets being used for parking by visitors to Leigh district centre and the nearby seafront."*

***Figure 5.7**: Key diagram for Leigh*



Prittlewell

5.4.13. Figure 5.8 shows 6 site proposals, none of which have planning permission:

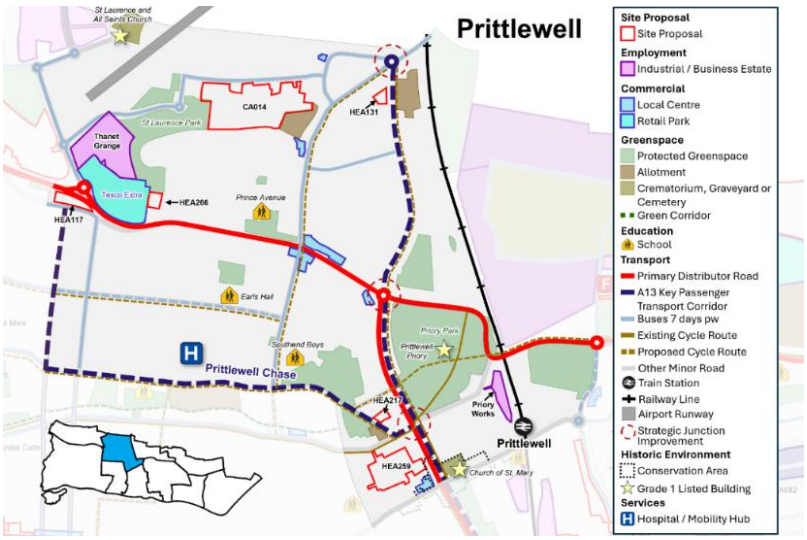
- HEA259 (Roots Hall Stadium; **250 homes**) – renovation to provide a modern community stadium with complementary uses and potential for some enabling residential.
- CA014 (South of Eastwoodbury Lane; **225 homes**) – potential for a new school as required and residential. Mainly Council owned agricultural land but not Green Belt.
- HEA217 (Land at Prittlewell Chase, adjacent to Brook Meadows House; **31 homes**) – residential development (potential for specialist accommodation) with landscaping. There is an element of flood risk (one of the 11 sites assessed in detail in the Level 2 SFRA).
- HEA117 (Land b/w Prince Avenue and A127; **29 homes**) – residential with landscaping and provision of a green buffer between the rear of the site and Prince Avenue (A127).
- HEA266 (Prince Close; **23 homes**) – potential redevelopment including residential, with landscaping, particularly to western boundary adjacent to commercial.
- HEA131 (St Stephen's Church, Manners Way; **7 homes**) – retain church and supporting community use, play area, and potential for complementary residential uses.

5.4.14. Two of these sites are unchanged from 2025, but HEA259, CA014, HEA266 and HEA131 were assigned an 'unknown' capacity in 2025. This serves to highlight the inherent challenge of assigning capacity figures to complex urban sites through a local plan, although the sites are now associated with a good degree of delivery certainty. Focusing on the largest two sites: HEA259 – there is now certainty regarding renovation of the stadium rather than delivery of a new stadium at Fossetts Farm (the development of Fossetts Farm will help to fund the renovation); and CA014 – latest work shows that primary school needs in the City can be met via extensions to existing schools, although the site could be an appropriate location to deliver a Special Education Needs school.

5.4.15. In conclusion, there are no omission sites and there are not known to be any options for boosting supply at any of the proposed sites, hence there is only one reasonable scenario.

5.4.16. Moving forward, the UCS does not identify Prittlewell as a key area for potential future growth, but the UCS explains that Prittlewell: *"… forms the gateway to the city centre, with the A127… forming a central spine… having a dominant impact… London Southend Airport is immediately to the north… Prittlewell railway station is in the neighbourhood… There are also frequent bus connections to the airport and beyond with much of the area accessible to services… Prittlewell is home to Southend University Hospital, Southend United Football Club… The area is largely characterised by low and medium density housing… There is a conservation area, at the East and West Street junction with the busy Victoria Avenue, including St Mary's Church and the historic Prittlewell Priory in Priory Park to the south..."*

***Figure 5.8**: Key diagram for Prittlewell*



Westcliff

5.4.17. Figure 5.9 shows 3 proposed allocations although one of these has planning permission. Focusing on the two non-permitted sites:

- HEA091 (Land at Westcliff Station (adj Valkyrie Road); **15 homes**) – potential for residential development with landscaping. A greenfield site but not Green Belt.
- HEA115 (Part of Hamlet Court Road Car Park; **7 homes**) – potential for residential development subject to operational requirements for public parking.

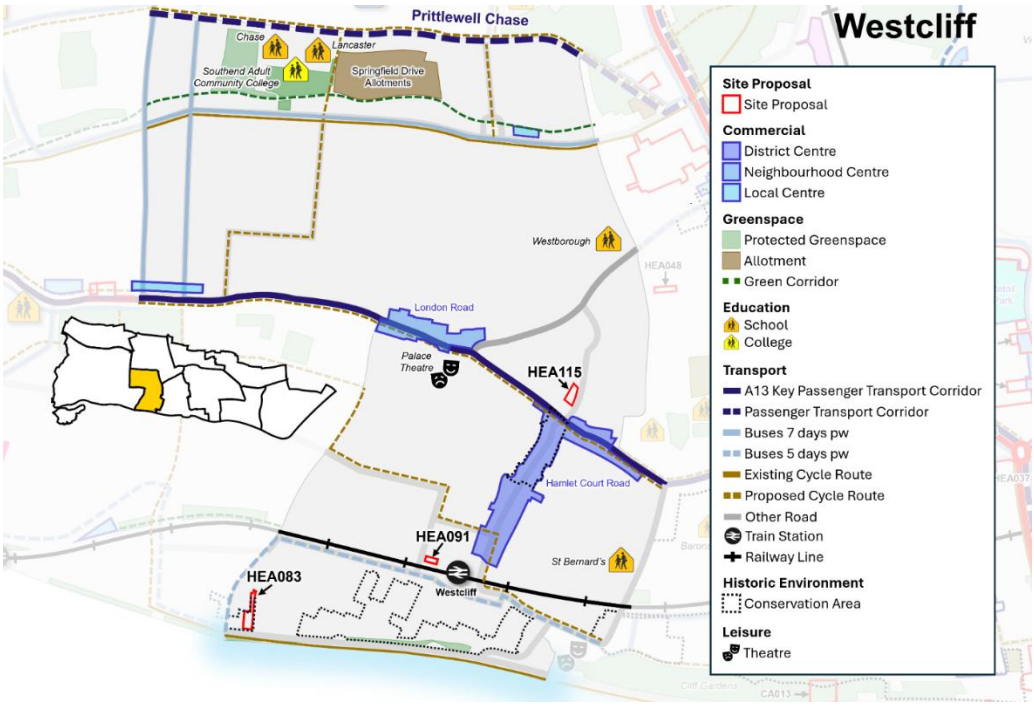
5.4.18. Both sites are of note including given proximity to a rail station and/or a district centre and, in this respect, it is notable that both would deliver housing only schemes but the density of housing on site varies significantly, specifically HE091 is proposed for 49 dph (the railway is a constraint) whilst HEA115 is proposed for 107dph. HE091 was previously proposed for 12 homes whilst HEA115 was previously proposed for 10 homes. HE091 is clearly a challenging site, comprising a small area of 'left over' greenspace adjacent to a station.

5.4.19. In conclusion, there are no omission sites and there are not known to be any options for boosting supply at any of the proposed sites, hence there is only one reasonable scenario.

5.4.20. Moving forward, the UCS identifies the potential for future growth along the A13 corridor, as per Leigh South (discussed above). Specifically in respect of Westcliff, the UCS states: *"Westcliff benefits from good access to a range of facilities, including education, health and civic uses, although [there is] potential to enhance green infrastructure provision."* It is understood that intensification above commercial units has been witnessed through the implementation of recent planning permissions, and further opportunities may exist.

5.4.21. Also, the UCS identifies that there should be an ongoing focus on growth opportunities at Westcliff District Centre (as per Leigh District Centre, as discussed above), including with a view to securing investment and given ease of access to Westcliff Station. However, and as per Leigh District Centre, there are constraints relating to character and heritage (most of Westcliff dates from the Victorian/ Edwardian era), and tall buildings are unlikely to be accessible. Also, and as per Leigh, across the neighbourhood there are issues from demand for parking spaces and pressure on local streets, particularly in the more tightly planned terraced streets, where there have been a number of house to flat conversions. Another issue is development pressure along the seafront and the potential erosion of the Edwardian seafront character for more modern, high-rise development.

***Figure 5.9**: Key diagram for Westcliff*



Southend Central

5.4.22. Figure 5.10 shows a total of 26 site proposals although 9 have planning permission, and 5 of the non-permitted sites are proposed for non-residential uses. With regards to the sites with planning permission, this includes a site for 1,760 homes (Better Queensway; HE096).

5.4.23. Of the 12 non-permitted residential sites, 9 are proposed allocations whilst the remaining 3 sites are 'opportunity sites' where delivery / capacity is uncertain at this stage.

5.4.24. Of the 9 proposed allocations, 5 stand out as notably large:

- CA006 (Victoria Avenue West; **798 homes**) – this site mostly has planning permission (565 homes) and overall the proposal is for high density (356 dph gross) mixed use, residential led development. It will continue to deliver beyond 2045 (847 homes in total), and it is notable that the previous expectation (2025) was that it would deliver in full by 2040. There is significant onsite surface water flood risk (see the Level 2 SFRA).
- CA009 (The Royals Shopping Centre; **253 homes**) – would involve residential alongside commercial / food and drink uses on the ground floor, and the assumption is a need to retain or reprovide current onsite parking. The assumption is delivery late in the plan period, with 253 homes by 2045 and then 380 homes in total. Gross density is 199 dph. At the previous stage this site was assigned an 'unknown' capacity figure.
- HEA042 (Former Gas Works, Eastern Esplanade; **150 homes**) – retention of parking with potential for mixed use development particularly to the north of the site. The principle of development is established through previous planning permission, but at the previous stage this site was assigned an 'unknown' capacity figure. From the Level 2 SFRA it appears that this is one of the two or three most challenging sites in flood risk terms.[18]
- CA007 (Sutton Road; **125 homes**) – an existing allocation and partly permitted. Within 400m of a railway station and gross density is 144 dph. Previously expected to deliver 150 homes in 2025. There is significant surface water and groundwater flood risk.
- HEA006 (Central House, 8 Clifftown Road; **107 homes**) – located in the primary shopping area and adjacent to locally listed Southend Central Station; the proposal is mixed use residential-led development. It will continue to deliver beyond 2045, such that it delivers 170 in total at a gross density of 641 dph. Previously expected to deliver in full by 2040.

5.4.25. Of the remaining 4 proposed allocations, the key site of note is CA012 (The Kursaal; 26 homes), which was previously not assigned a residential capacity figure. The proposal is for leisure / cultural / tourism uses to provide visitor attractions, conserving and enhancing the prominent Grade II listed Kursaal building, with the potential for enabling housing to the rear. It appears that this is one of the two or three most challenging sites in flood risk terms.[19]

5.4.26. The remaining 3 proposed allocations are quite small sites that inherently give rise to limited concerns given a City Centre / Central Area location. Specifically, HEA045, HEA107/ EA042 and HEA278 are allocated for **35 homes** in total. The largest of these (HEA107/ EA042) is an existing allocation but is expected to deliver late in the plan period with additional homes delivered beyond the plan period, and gross density is 137 dph. The two smaller sites have previous planning permissions and gross density is around 200 dph.

5.4.27. The following sites are then proposed opportunity sites (reflecting uncertainties):

- HEA267 (Grainger Road; **240 homes to 2045**) – 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. The assumption is delivery of 240 homes by 2045 and then 360 homes in total.

[18] The Level 2 SFRA notably concludes: *"… The site is shown to be protected by tidal defences; however, the entire site is shown to be at risk in the defended 0.5% AEP and 0.1% AEP climate change events with significant depths across the site [and] the site is at residual risk of tidal flooding due to breach or overtopping of the tidal defences. Breach modelling has shown that breaches during the larger flood events provide little to no warning time at the site."*

[19] The Level 2 SFRA notably concludes: *"… The site is shown to be protected by tidal defences… but these are overtopped during the climate change events… The site is at residual risk of tidal flooding due to breach or overtopping of the tidal defences… breaches during the larger flood events [would] provide little warning time… There is considerable surface water ponding… showing an increase with climate change shown the site. Surface water risk… may impede some potential access and escape options."*

- CA005 (Victoria Avenue East; **186 homes to 2045**) – a key mixed use regeneration area with a civic function and part of an existing allocation in the Southend Central Area Action Plan (2018) and where there is planning permission for 122 homes. There is a need to retain existing uses and conserve the Grade II listed Museum and Civic Fountain. The assumption is delivery of 186 homes by 2045 and then 334 homes in total.
- HEA269 (Central Station; **60 homes**) – continued used of the station with potential for mixed use residential development with commercial uses. Gross density is 199 dph.

5.4.28. All three of these sites were previously assigned an 'unknown' capacity figure in 2025.

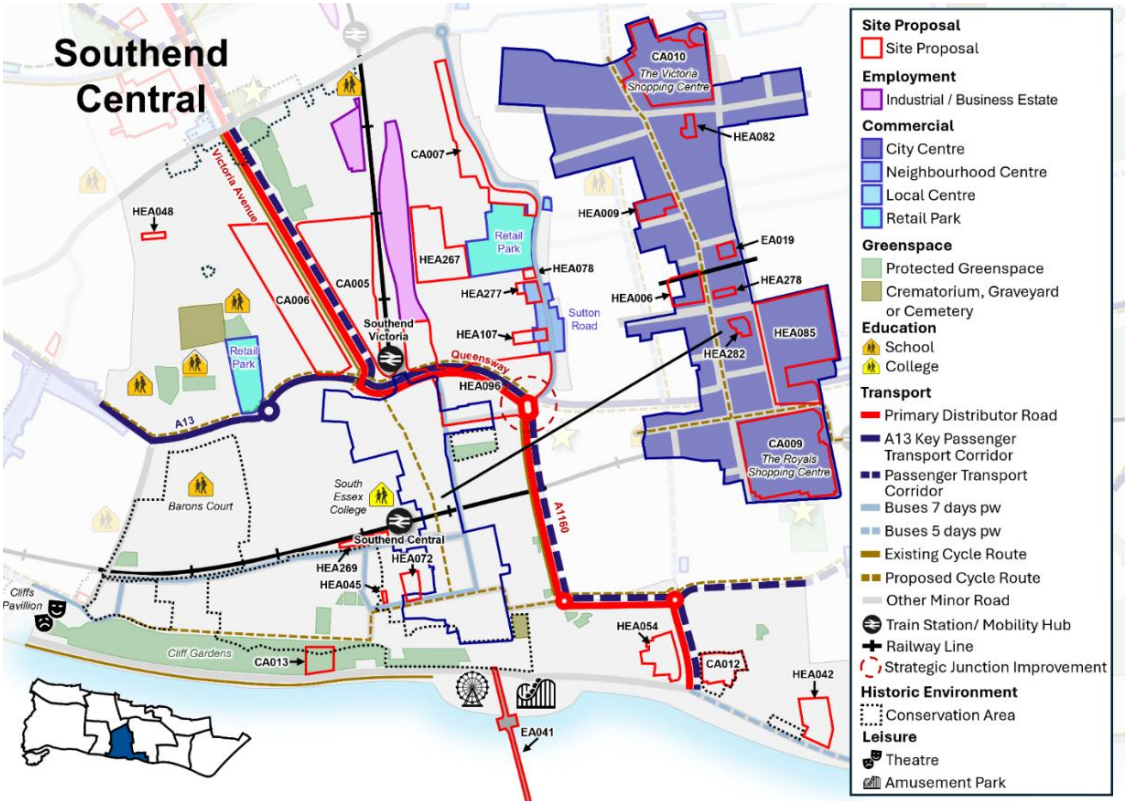
5.4.29. A final site of note is then EA019 (Whitegate Road) which is not assigned a housing capacity figure, but where there could be potential for some modest residential as part of an employment / commercial led redevelopment. This is a vacant site adjacent to the high street and previously allocated in Borough Local Plan (1994).

5.4.30. There are not considered to be any omission sites, however the following site were included within the Draft Plan in 2025: HEA037 (96 Southchurch Road) – previously proposed for 8 homes but now under construction; HEA280 (1B Queens Road) – previously proposed for 9 homes but availability is unknown and a low yield is estimated; and CA011 London Road – the availability of this area, which includes a number of different sites and land ownerships, is unknown (it is therefore considered within the urban capacity study).

5.4.31. In conclusion, there are no omission sites and there are not known to be any options for boosting supply at any of the proposed sites, hence there is only one reasonable scenario. The discussion above serves to demonstrate the challenge that exists in respect of committing to supply from complex city centre redevelopment / regeneration sites, including noting challenging viability. The Interim SA Report (2025) discussed the 'zones' in the city centre and suggested the possibility of defining alternative vision-led growth scenarios; however in practice it is not possible to define alternative scenarios at the current time.

5.4.32. Moving forward, the UCS identifies potential further growth opportunity.

***Figure 5.10**: Key diagram for Southend Central*



Southchurch

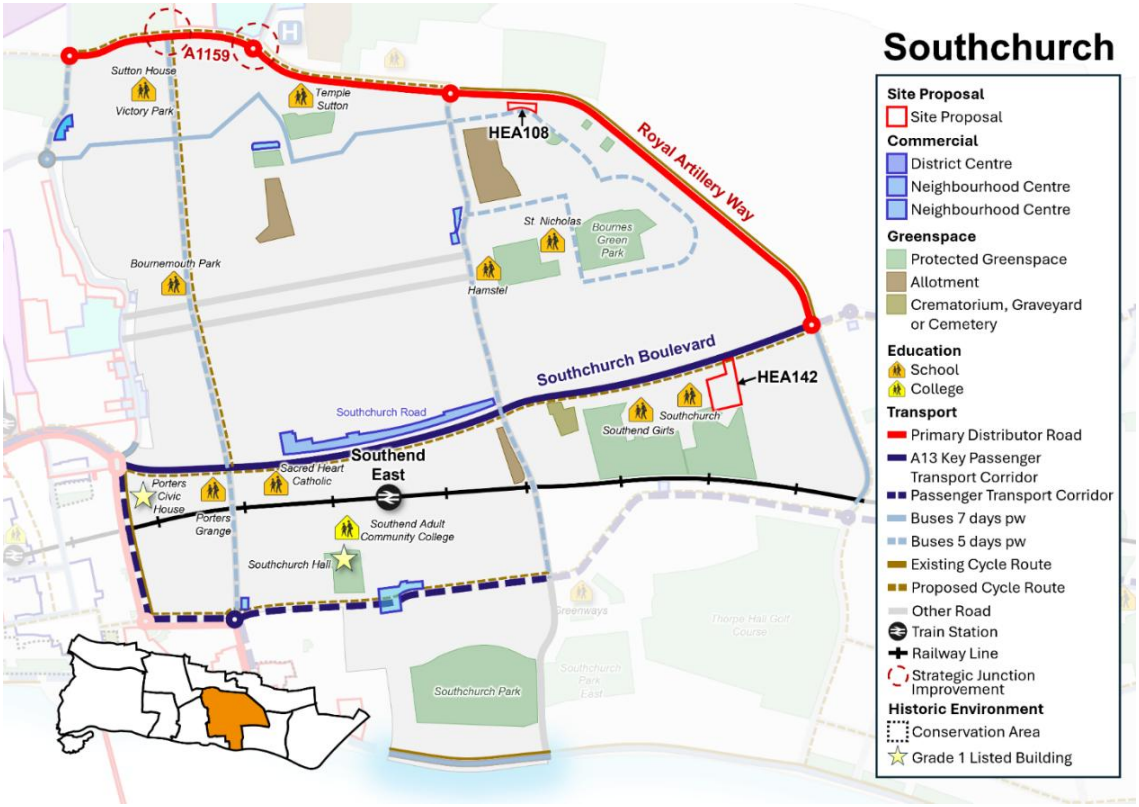
5.4.33. Figure 5.11 shows 2 site proposals, neither of which have planning permission:

- HEA142 (Former Futures College, Southchurch Boulevard; **56 homes**) – proposed for residential with landscaping. Capacity is unchanged from 2025 and density is 37 dph.
- HEA108 (Archer Avenue; **10 homes**) – currently informal green space. Potential for 10 houses with open space and retention of the holocaust memorial tree. Capacity is unchanged from 2025 and density is 42 dph.

5.4.34. In conclusion, there are no omission sites and there are not known to be any options for boosting supply at any of the proposed sites, hence there is only one reasonable scenario. It could be suggested that higher density is an option, but both sites are more than 800m from a rail station and there is a need to consider the importance of delivering family homes.

5.4.35. Moving forward, the UCS identifies the potential for future growth stating: *"Southchurch is well served by public transport, highly accessible and most of the area is within the catchment of a large number of services and facilities being close to Southend city centre."* Southend East Station and the nearby neighbourhood centre is a key area. However, the UCS also explains: *"North/south of Southchurch Road [the A13] development is often more tightly planned, including traditional terraced streets. These areas often suffer from issues such as parking stress due to the demand for on street parking, exacerbated by… lack of off-street parking… [and] conversion of… houses to flats/maisonettes."*

***Figure 5.11**: Key diagram for Southchurch*



Fossetts

5.4.36. Figure 5.12 shows the 4 proposed allocations introduced above in Section 5.2.

5.4.37. 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.

5.4.38. For completeness, the 2 sites with permission are HEA262/EA049 (221 homes) and HEA263/EA022 (122 homes) and the density at these sites is 41 and 21 dph respectively.

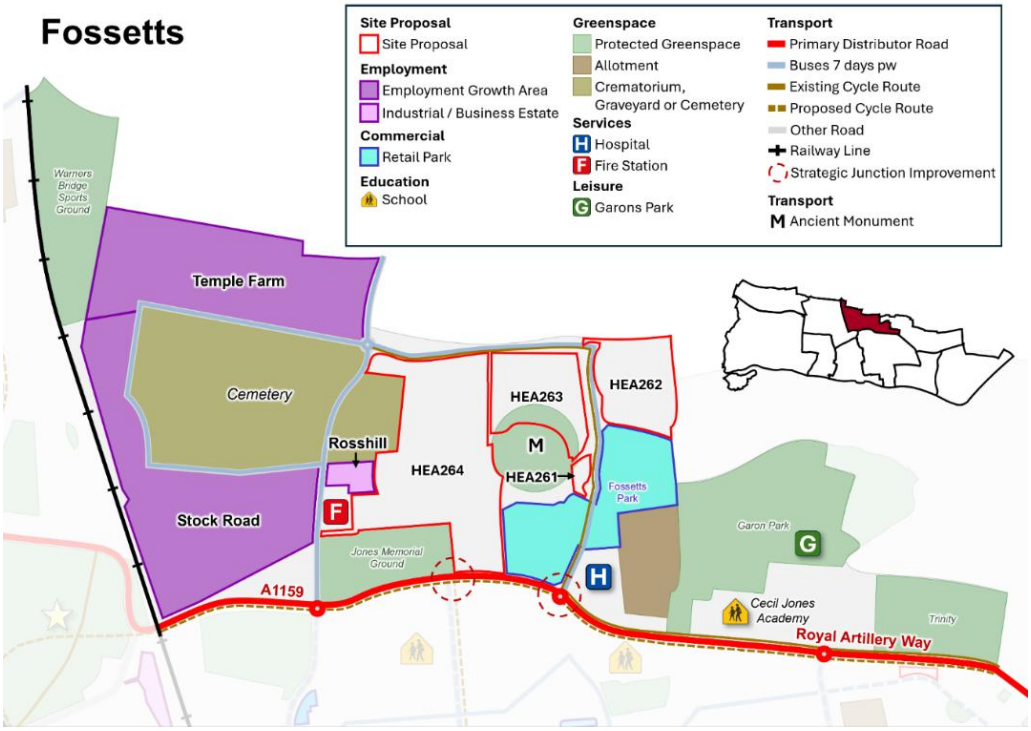
5.4.39. The non-permitted sites are:

- HEA264/EA047 (Fossetts Farm; **966 homes**) – part of site is within the Green Belt and confirmed good agricultural land, although this is potentially excellent. The site has potential for mixed use residential development with supporting commercial and community uses, together with enhancements to pedestrian and cycle connections, public and private green space, and public realm enhancements. It was previously considered as a possible location for a relocated stadium, but this is no longer the case (see above), and there is a pending planning application. Proposed gross density is 47 dph and 466 homes are expected in years 6-11. There is an adjacent scheduled ancient monument.
- HEA261 Land West of Fossetts Way (near roundabout and Petrol Station); **46 homes**) – located adjacent to a Scheduled Monument and grade 2 agricultural land, although not currently in active use. The proposal is for residential with landscaping/ greening and with the potential for commercial floorspace. Proposed gross density is 114 dph and crucially the site is expected to deliver in years 6-11 of the plan period.

5.4.40. In conclusion, there are no omission sites and there are not known to be any options for boosting supply at any of the proposed sites, hence there is only one reasonable scenario. It is clear that there is an element of uncertainty given the matter of Roots Hall stadium.

5.4.41. Moving forward, there is a need to acknowledge that, at the time of writing the Rochford Local Plan appears set to propose strategic growth to the north and north west of this area (either side of Sutton Lane), as discussed above. Also, and as discussed above, there is a need to consider whether there could be additional growth opportunity to the north east of Fossetts Farm to link the Rochford and Southend components of LNOS.

***Figure 5.12**: Key diagram for Fossetts*



Thorpe Bay

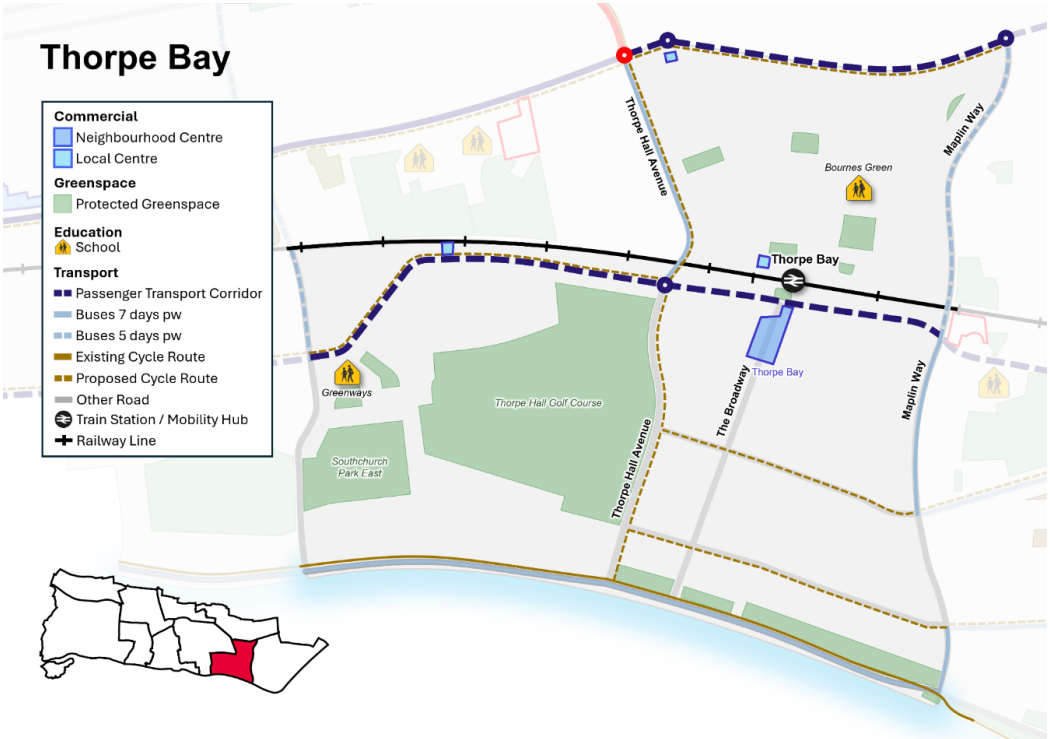
5.4.42. Figure 5.13 shows that there are no proposed allocations in this area, which is a reflection of this being a relatively modern part of the City and no sites having been promoted. This situation is unchanged from that at the Regulation 18 Draft Plan stage in 2025.

5.4.43. 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 LNOS (discussed below).

5.4.44. In conclusion, there are no omission sites and so there is only one reasonable scenario.

***Figure 5.13**: Key diagram for Thorpe Bay*



Shoeburyness

5.4.45. Figure 5.14 shows 7 site proposals although 4 of these have planning permission.

5.4.46. With regards to the permitted sites, one is notably affected by flood risk and another was proposed for 56 homes in 2025 but is now proposed 18 homes in line with a permission.

5.4.47. Of the 3 non-permitted sites, 2 are proposed allocations:

- HEA137/EA021 (Land at Elm Road; **250 homes**) – development of the site offers the opportunity to address land contamination and provide public open space. Proposed density is 66 dph and the site was notably assigned an 'unknown' capacity in 2025 at which time it was under consideration to deliver a school. The evidence now shows that a school is not needed, although there is a need to note the context of an pending planning application for 850 homes in Rochford District adjacent to Shoeburyness.
- HEA135 (Land at George Street; **8 homes**) – development would result in the loss of some open space (not publicly accessible) but there is an opportunity to deliver accessible green space to the rear of the site, providing additional recreational space at East Beach. Proposed density is 25 dph and proposals are unchanged from 2025.

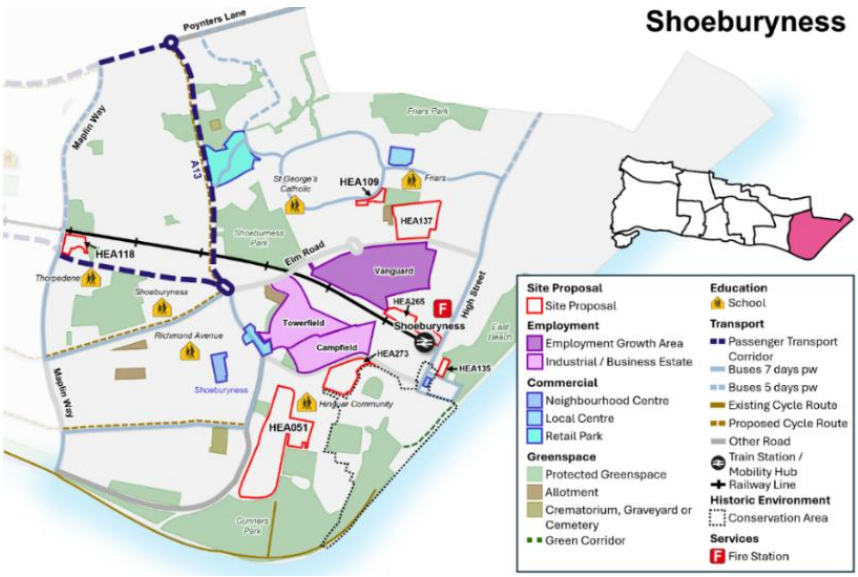
5.4.48. The proposed 'opportunity site' is then HEA265 (Terminal Close; **100 homes**), which would see redevelopment of underused employment land, and which may include an element of commercial, e.g. convenience retail fronting Shoebury High Street. The site is adjacent to Shoebury Station and the proposed density is 101 dph. In 2025 capacity was 'unknown'.

5.4.49. Again, the above serves to highlight the challenge of determining urban supply.

5.4.50. In conclusion, there are no omission sites and there are not known to be any options for boosting supply at any of the proposed sites, hence there is only one reasonable scenario. Accounting for permissions there is proposed to be around 700 homes delivered across the neighbourhood by 2045, which represents a high growth strategy and should bring with it the potential to deliver targeted benefits to the community over-and-above new homes. Also, there is a need to acknowledge a pending planning application adjacent to the north, within Rochford District, for 850 homes, with the possibility (at the time of writing) of the emerging Rochford Local Plan allocating the site for 950 homes plus a primary school.

5.4.51. Moving forward, the UCS discusses potential future opportunities around railways stations, but does not specifically discuss opportunities around Shoebury Station (other than Terminal Close, which is an identified opportunity site). The UCS further explains: "*There is good accessibility to rail and or frequent bus services from the central part of the area. Areas to the north of the railway are not as accessible… There are a wide range of spatial and architectural characteristics over several distinct zones in the neighbourhood.*"

***Figure 5.14**: Key diagram for Shoeburyness*



Land North of Southend (LNOS)

5.4.52. This is the final sector of land for consideration, as discussed in Section 5.2. It comprises the only sector of land within the Southend Green Belt not subject to absolute constraints.

5.4.53. As discussed in Section 5.2, the proposal is to allocate LNOS in Southend to deliver a 4,900 home scheme, which would deliver in fully by 2045. Specifically, annual delivery rates are expected to increase from 100 dpa in the early years of the plan period up to around 400 dpa by 2045. However, there are inevitably significant uncertainties associated with these figures, particularly due to major infrastructure dependencies.

5.4.54. As discussed in Section 5.2, at the time of writing Rochford District may allocate land to the west ('West LNOS') for 3,500 homes, although only 1,650 homes would be anticipated to deliver by 2045. There are specific reasons why LNOS in Southend is expected to deliver at a faster rate, including relating to infrastructure dependencies and the fact that planning applications for LNOS in Southend are relatively advanced, specifically: one planning application for 2,000 homes has been submitted and refused (25/01792/OUTM; bournesgreen.com); and another for 3,000 homes anticipated (landnorthofsouthend.com).

5.4.55. The Southend and Rochford elements of LNOS are separated by only around 1km (Garon Park); however, at the current time there is no clear potential to combine the two sites such that they deliver as a comprehensive cross-border scheme, as discussed in Section 5.2. Nonetheless, there is clearly a need for both elements of LNOS (west and east) to be planned for cognisant of the other (or, at least, what might come forward at the other) particularly given shared infrastructure dependencies with associated costs.

5.4.56. Also, when planning for the two individual elements of LNOS, the question clearly arises as to whether there should be 'one eye' on the possibility of revisiting and expanding proposals in the future so as to deliver a comprehensive cross-border scheme. This would require additional land to be allocated in Rochford District, such that a comprehensive cross-border scheme is not an 'option' for the Southend Local Plan, but it is an important matter for ongoing consideration, and is a focus of further discussion below.

5.4.57. In short, there are two clear options for LNOS in Southend at the current time:

- Do not allocate LNOS, as per the approach previously proposed in 2025 and notwithstanding the Local Plan would generate around 18,300 homes unmet housing need such that there would be a high risk of the Local Plan being found to be unsound.
- Allocate LNOS to deliver 4,900 homes within Southend within the plan period.

5.4.58. Finally, there is feasibly the option of delivering additional homes within the Southend part of LNOS by extending it to the west, and more specifically by additionally allocating the western 18 holes of the 27 hole golf course at Garon Park, namely HELAA site CA001. The current proposal is to allocate the eastern nine holes including noting that the golf course as a whole is being promoted by Bellway Homes whose anticipated planning application does not cover the western 18 holes (HELAA site CA001). Also, the Regulation 18 representation received from Bellway Homes in 2025 did not promote CA001 for residential. However, Bellway Homes now state that work is ongoing to consider the future role of CA001 as part of a wider masterplan, and suggest that CA001 could deliver 500 homes subject to re-provision of the golf course. In conclusion, it is ruled out for the following reasons:

Proposals are uncertain at this stage, and it is not clear that this could assist with linking effectively to LNOS in Rochford District (past work to consider a comprehensive cross-border scheme has sought to retain and enhance Garon Park and deliver linking growth to the north); the evidence identifies a need to retain the golf course (recalling that 9 holes of the current 27 hole course are set to be lost); there is a need to carefully plan for Garon Park as a key city-wide asset; CA001 is constrained including noting that the eastern part is associated with a notable density of woodland, a bridleway and a stream corridor; and the Local Plan must only commit to delivery at sites known to be 'developable'.[20]

[20] The other feasible possibility is assuming higher density development within LNOS, noting that proposed gross densities are around 20 to 25 dph. However, there is no justification for this on the basis of the concept masterplanning work undertaken to date, including because at the heart of the vision is family housing and extensive non housing uses including green / blue infrastructure.

Conclusion on sub-area scenarios

5.4.59. The discussion in this section serves to confirm the conclusion tentatively reached above, 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).

5.4.60. At this stage there is a clear case for allocating LNOS, given the limited supply from other sources and also significant uncertainties associated with the urban supply.[21] However, the possibility of not allocating LNOS remains a reasonable alternative, including recalling that this was the proposed approach in 2025 (albeit LNOS was presented as a clear option).

5.4.61. With regards to the possibility of planning for LNOS in Southend on the assumption that it would come forward as part of a comprehensive cross-border scheme in conjunction with land in Rochford District, whilst this was considered as a 'sensitivity test' scenario within the Interim SA Report published alongside the Draft Plan in 2025, it is no longer a scenario for formal consideration, given latest proposals in Rochford District and the 31st December submission deadline. However, it clearly warrants ongoing informal consideration.

5.4.62. Finally, Box 5.4 discussed potential options / alternatives in respect of delivering a supply of **employment land** to deliver on established needs (as discussed in Section 5.2), concluding that the only strategic choice is in respect of whether or not to support LNOS.

***Box 5.4**: Employment land options / alternatives*

Sites are identified to deliver a net increase of 68,400 sqm of employment space (Use Class e(g)/b):

- Designated employment areas – in total c.41,000 sqm are assumed across 6 of the 16 employment areas, with the bulk from: 1) Airport Business Park (c. 16,500 sqm with planning permission); Progress Road, Eastwood (c. 11,000 sqm); and Vanguard Way, Shoeburyness (c.9,550 sqm; includes a recent permission); Stock Road (c. 1,900); Temple Farm (c. 2,200). This is informed by an Employment Intensification Study (2026) and information relating to planning permissions at Airport Business Park.
- Employment allocations – totalling c. 6,700 sqm, namely Land at Nestuda Way (CA004) (c. 5,000 sqm) and Whitegate Road (EA019) (c. 1,700 sqm).
- Mixed use allocations in the City Centre – totalling c. 8,200 sqm, comprising Better Queensway (HEA096, EA039) (c. 4,700 sqm) and Victoria Shopping Centre (CA010) (3,500 sqm).
- LNOS – 12,500 sqm is expected within Southend (see discussion below re. LNOS in Rochford).

It is understood that this supply provides for needs for both industrial land and office floorspace identified by the Economic Needs Assessment (2026), as per the discussion above. Also, at the time of writing it can be noted that the Rochford Local Plan may allocate a 13.6 ha strategic extension to Temple Farm Industrial Estate located adjacent to Southend, as part of LNOS in Rochford.

There are no omission sites, and there are not known to be any clear options for significantly boosting the employment land supply from any of the proposed allocations. As such, the only strategic choice is in respect of whether or not to support LNOS.

[21] Firstly, there is a need to reiterate that 586 homes of the total 8,450 homes urban supply comes from 'opportunity sites' that are specifically not presented as formal allocations because of delivery uncertainties (N.B. this is in line with the NPPF, which allows for reliance on supply from 'broad locations' in the latter part of the plan period). Secondly, numerous of the proposed allocations are associated with an element of delivery uncertainty, as evidenced by the changes that have been made to site capacities since the previous consultation stage (2025). In particular, in Southend Central there are potentially uncertainties associated with some of the larger allocations, including given the viability challenge of taller buildings (in particular buildings involving more than circa 6 stories such that they additional fire safety measures); and in Shoeburyness there is an element of uncertainty associated with the main allocation for 250 homes including noting onsite contamination issues. Thirdly, in Southend Central there is uncertainty regarding Better Queensway (HE096), which is permitted for 1,760 homes but where the Council is currently evaluating options for the future delivery of the housing and regeneration elements, including Council-led delivery, securing a new development partner, or revising the existing scheme (this review reflects changes in legislation and building regulations, together with changes in build costs, materials and wider economic conditions, although it is important to be clear that the Council remains committed to the regeneration of the area and is expected to report its preferred approach to a future Council Cabinet meeting).

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** – urban supply plus Fossetts Farm = 9,800 homes
- **Scenario 2** – scenario 1 plus LNOS = 14,700 homes

5.5.4. For context, it is important to recall that LHN is 28,100 homes and that the above figures relate to supply not the housing requirement. Matters are discussed further below.

5.5.5. The two figures below (from the plan document) present visual summaries of Scenario 2.

***Figure 5.15**: The Local Plan Key Diagram (Growth Scenario 1)*

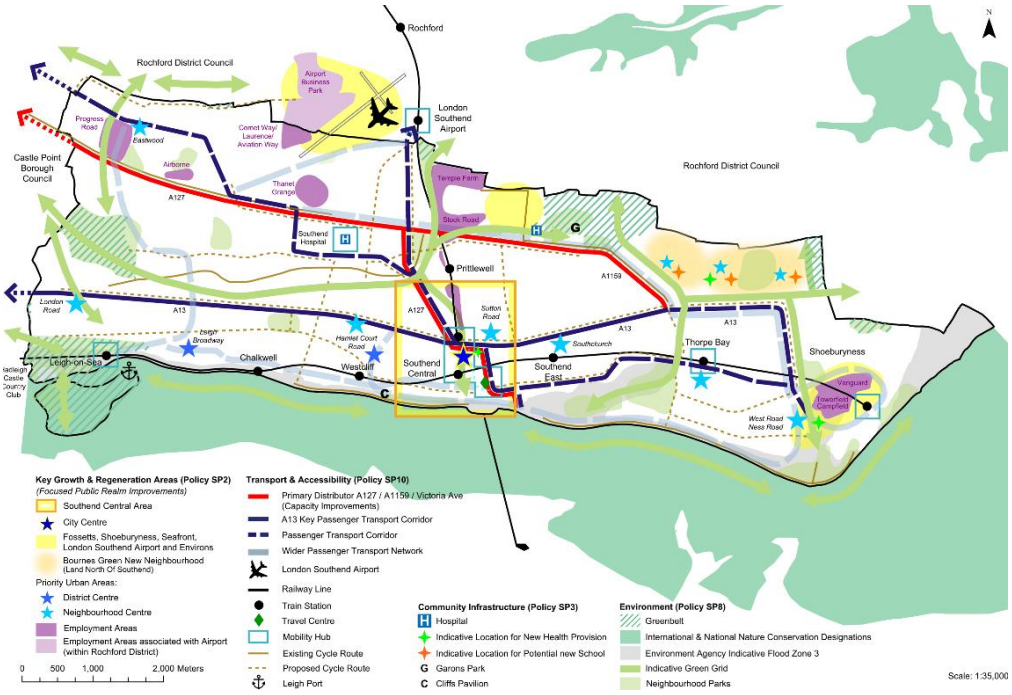
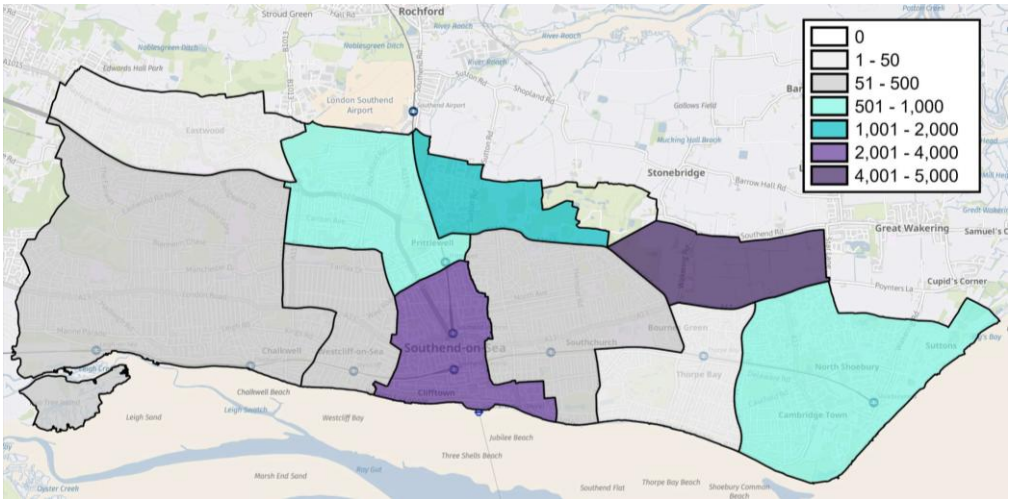


***Figure 5.16**: Distribution of housing under Growth Scenario 1 (incl. permissions)*



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** – urban supply plus Fossetts Farm = 9,800 homes
- **Scenario 2** – scenario 1 plus LNOS = 14,700 homes

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. Within the appraisal discussions there is a particular focus on LNOS, which is the 'variable' across the two scenarios, but supply components of Scenario 1 (urban supply and Fossetts Farm) feed into conclusions on significant effects and are considered further in Part 2.

Assumptions

6.1.4. Key assumptions are as follows:

- Delivery – there is a need to make assumptions regarding what precisely could be delivered by sites, most notably LNOS including in terms of use mix, infrastructure and affordable housing. Evidence is available to draw upon including the Infrastructure Delivery Plan (IDP) and Viability Study, but work remains ongoing at the time of writing.
- Growth elsewhere – there is a clear need to plan for growth in Southend cognisant of growth elsewhere in South Essex, and most notably in Rochford and Castle Point. Shared road corridors are a primary consideration, but there are a range of other important cross-border and large-than-local issues that require collaboration between local plans. As part of this, and has been discussed, there is a clear need to plan for LNOS in Southend cognisant of what will or could happen within the Rochford part of LNOS to the west.
- The baseline – a key assumption is in respect of the future baseline, i.e. the situation without an adopted plan with a robust land supply, i.e. sufficient to deliver on the housing requirement. Specifically, the assumption is that there would be sub-optimal growth under the presumption in favour of sustainable development (accounting for Policies S3, S4 and S5 in the 2026 version of the NPPF, which applies for the purposes of decision-making). This could potentially involve sub-optimal piecemeal Green Belt development, including recalling pending and anticipated planning applications for LNOS in Southend. However, this is highly uncertain, including recalling that LNOS is not grey belt, which has implications for the presumption in favour of sustainable development (NPPF Policy S5).
- Unmet need – it is reasonable to assume that unmet need from Southend would lead to additional pressure for growth within a constrained sub-region, but this is highly uncertain. In practice, unmet need might not be provided for in the short term but then might be provided for in the longer term following Local Government Review (LGR) and/or following a sub-regional Spatial Development Strategy (SDS) under the devolution agenda.

6.2. Accessibility (to community infrastructure)

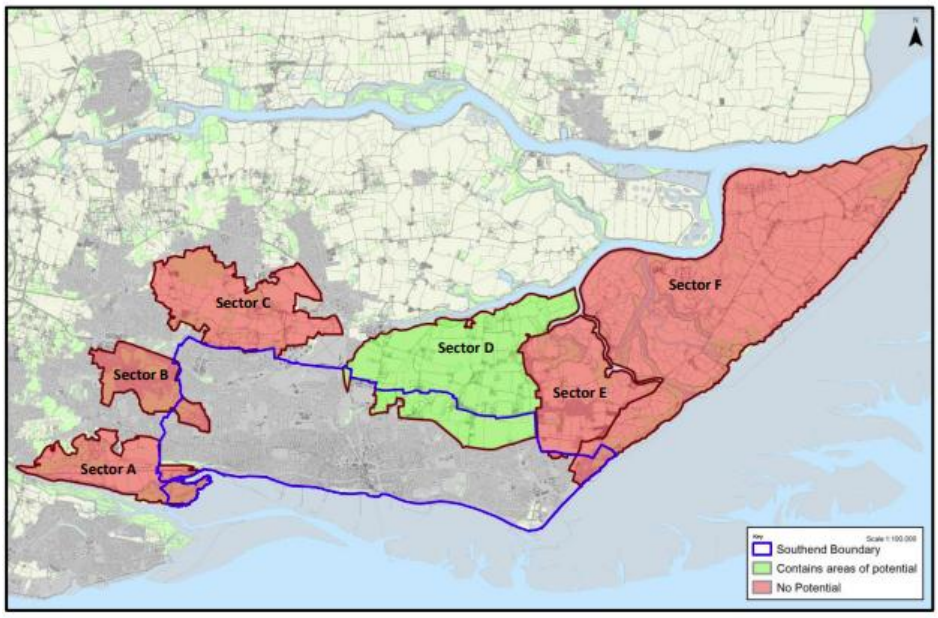
Scenario 1: 9,800 homes	Scenario 2 14,700 homes
2	**1**

6.2.1. There is clear support for Scenario 2 because LNOS represents a key opportunity to deliver community infrastructure alongside new homes, including: A) three neighbourhood centres with two primary schools, one all through / secondary school and one primary healthcare facility; B) strategic green and blue infrastructure including strategic open space to address an existing need; and C) a range of strategic transport infrastructure, which is discussed further below, but which will include walking and cycling routes leading to community benefits. Also, LNOS is adjacent to Garon Park, which might benefit from investment, albeit the proposal is to develop on 9 holes of the current 27 hole golf course.

6.2.2. Under Scenario 1 there are some concerns regarding healthcare and secondary school capacity in Southend, recognising limited land availability in Southend and challenging viability that affects the ability of urban redevelopment sites to both deliver affordable housing and deliver or contribute financially to infrastructure (CIL and S106). Also, the additional unmet need generated would lead to additional pressure for growth elsewhere across SE Essex at sites that are less well suited to delivering community infrastructure alongside new homes. There are limited opportunities for strategic growth in SE Essex.

***Box 6.1**: Strategic growth opportunities in South East Essex*

The figure below is from the Strategic Growth Locations Assessment (2019), which identified LNOS as the only sector of land in South East Essex capable of accommodating large-scale strategic scale growth, e.g. sufficient to deliver strategic community infrastructure including a secondary school. Sectors A, B and C to the west are constrained in environmental terms including given ancient woodland, remnant heathland and river headwaters associated with the district geological feature that is the ridge running from Hadleigh to Hockley, aligned with the importance of supporting nature recovery via a new focus on ecological networks, i.e. avoiding or addressing the fragmentation of habitats. As part of the recent Castle Point Local Plan examination in public there has been some discussion of possible strategic scale growth to the north west of Thundersley (west of the A130 and south of the A127) but there are a range of constraints and infrastructure challenges that preclude or greatly limit what could be achieved, including access. To the east Sectors E and F are relatively poorly connected and constrained including by proximity to internationally important marshes. To the north, land around Hockley and Rochford is less well connected to the main road corridors.



6.2.3. Also, if the Local Plan does not support LNOS there is a chance that it would come forward in any case (via the planning application and potentially the appeal process) in a way that is sub-optimal in terms of community infrastructure. For example, across the two planning applications currently under consideration – for 5,000 homes in total – the proposal has previously not involved a secondary school, although it is understood that through recent discussions with the site promoters the potential to deliver a secondary school has been established. A local plan is an opportunity to masterplan and leverage funding for infrastructure, all aimed at comprehensive growth that maximises benefits.

6.2.4. The Planning Statement for the recently refused 2,000 home application (25/01792/OUTM) does not reference a comprehensive LNOS scheme other than within the following statement: *"The latest Regulation 18 version of the plan sets out [the option of] the allocation of the application site as part of a wider masterplan that includes land to north and adjacent sites to the east and west... it has no or limited weight other than in respect of the scale of the challenge it faces in meeting its objectively assessed need for housing..."*

6.2.5. Returning to Scenario 2, as discussed LNOS within Southend represents a key opportunity to deliver 'infrastructure-led' growth, including as it is a relatively unconstrained greenfield site suggestive of strong development viability and, in turn, good potential to make land and funds available to deliver infrastructure including community infrastructure. However, on the other hand, there are major infrastructure costs that are uncertain at this stage, which could require compromises / trade-offs, for example in terms of community infrastructure or affordable housing. In particular, planning for transport infrastructure planning is clearly challenging such that there is a risk of high costs for this element of infrastructure.

6.2.6. This serves to highlight the importance of giving ongoing consideration to the possibility of a comprehensive cross-border scheme, albeit this is not an option for the Southend Local Plan. The concern is that the opportunity to plan most effectively and efficiently for infrastructure, and to leverage maximum funds (both from developers and other sources), risks being missed on account of LNOS not being planned for comprehensively. For example, at the time of writing the proposal is for both the Southend and Rochford elements of LNOS to deliver a secondary school, which is a matter for ongoing scrutiny.[22]

6.2.7. Box 6.1 summarises key evidence from the Southend Infrastructure Delivery Plan (IDP).

6.2.8. In **conclusion**, there are concerns with regards to community infrastructure capacity under Scenario 1, including due to unmet need and the risk that the Local Plan is found unsound such that LNOS within Southend risks coming forward in a sub-optimal piecemeal fashion, e.g. without a secondary school. However, it is difficult to suggest a negative effect on the baseline, given that this is a scenario whereby growth would likely come forward in the absence of an up-to-date local plan under the presumption in favour of sustainable development, hence a neutral effect is predicted for Scenario 1. With regards to Scenario 2, whilst LNOS represents a key opportunity to deliver infrastructure-led growth there are significant uncertainties including on account of the challenge of cross-border planning.

***Box 6.1**: LNOS-related community infrastructure issues and opportunities*

Beginning with **education**, the IDP explains that the birth rate in Southend-on-Sea reached its highest point in 2010/2011, such that over recent years there has been a drop in primary school pupil numbers and an increase in secondary school pupil numbers. With regards to primary schools, there is an overall surplus across the city, but this is unevenly distributed geographically. With regards to secondary education, some schools are over capacity and city-wide a capacity shortfall is anticipated in the coming years. The IDP also discusses locational principles for a secondary:

"… a coordinated education infrastructure strategy involving Southend-on-Sea City Council, Rochford District Council, Essex County Council, the Department for Education and local education providers would be necessary. Such an approach would support the alignment of school place planning, infrastructure delivery, land assembly and developer contributions..."

[22] The Rochford IDP (2026) states that there is a need to deliver a large (10fe) secondary including to meet the needs of the Great Wakering area, but LNOS in Southend is in far closer proximity to Great Wakering than LNOS in Rochford.

Next is **healthcare** and, in this regard, there is very strong support for LNOS as a suitable location to deliver a multi-practice hub, or an integrated health and community facility. There is a "significant and system-wide capacity deficit in the primary care estate" within Southend, with most GP surgeries over capacity and with no potential to expand, and a total deficit of 4,500m^2 clinical floorspace.

Aligning with NHS strategy is often challenging,[23] but LNOS represents an established opportunity; indeed the current 2,000 home planning application (Bournes Green) proposes a healthcare hub of approximately 1,000–1,100 m^2 within the local centre, which could serve around 15,000 people.

Finally, with regards to acute care, the Local Plan will impact on Southend Hospital, and there is also a need to consider the possibility of LNOS in Rochford District, but the NHS trust's long term infrastructure strategy is not yet finalised. Given the strategic and cross boundary nature of LNOS, a number of these requirements will need to be planned and delivered in partnership with Rochford District Council and the relevant infrastructure and service providers.

Wider community infrastructure-related matters discussed within the IDP is then as follows:

- Community hubs – *"… LNOS presents an opportunity to embed community infrastructure within the masterplanning process from the outset. New development should incorporate accessible and flexible community facilities that promote healthy ageing, age friendly communities, inclusion, independence and community cohesion. The provision of community hubs and spaces for voluntary and community sector activity should be considered alongside housing delivery to ensure that social infrastructure is available as new communities are established."*
- Libraries etc – *"The cost of a new library is estimated in the region of £12-15m, with a library contribution in the region of £700 to £1,400 per dwelling considered to be appropriate for a development of the scale of LNOS... This provision could be co-located within other community facilities delivered as part of the developments, such as health, leisure, cultural..."*
- Best Start Family Hub – *"Given the scale and concentration of growth planned… the location and phasing of this additional hub and network site should be considered so that new communities have access to early years and family provision as they are occupied. There is also an increasing trend towards integrating youth provision with other services, including the co-location of youth services with libraries, family centres and leisure facilities."*
- Sports – "*The 2026 Playing Pitch and Outdoor Sports Strategy (PPOSS) identifies that… The most significant pressures relate to football, cricket and artificial grass pitch provision, with additional investment requirements identified for changing facilities, athletics provision, netball facilities and wider community sports infrastructure. The PPOSS also highlights the importance of improving accessibility, increasing community use of existing facilities and ensuring that facilities are capable of supporting… participation, including women's and girls' sport."*
- Emergency services – the IDP discusses the possibility of a new Ambulance Hub, and in respect of a fire station explains: "*The requirement for a new 'standalone' fire station has not been identified at this stage and the position is to be kept under review. A new station may be required if ECFRS consider that it would better meet the longer-term estate objectives… [for] the wider Southend area, incorporating strategic growth [at LNOS]."*

These points reflect an assumption that LNOS in Southend delivers as a standalone scheme; however, were it to be possible to plan comprehensively for LNOS as a cross-border scheme (which is not an option for the Southend Local Plan, but which requires ongoing consideration), there could be significant additional opportunities, e.g. a larger integrated care hub and/or a flagship cultural hub. Also, it is important to add that high level work exploring comprehensive cross-border LNOS options over recent years has sought to place an enhanced Garon Park at the centre of the vision.

[23] The ICB is producing a Population Health Improvement Plan for Essex Integrated Care Board (2026 – 2031) which sets out the five-year strategic ambition for health needs in Essex and aligns with the NHS 10-Year Health Plan. The ICB has established four major transformation programmes, including neighbourhood health. The national policy paper Neighbourhood Health Framework (2026) sets out the development of Neighbourhood Health Services which will cater to most health and wider needs. This will be delivered through Neighbourhood Health Centres (NHC), which will gather GP services with a mix of community, local authority, civil society and Voluntary, Community and Social Enterprise sector services, allowing staff to join up care, resulting in more care being delivered in the community. Plans for developing and delivering Neighbourhood Health services will need to be set out in local Neighbourhood Health Plans, and co-developed with local government, the NHS and other system partners. While neighbourhood health models may change the way services are delivered, they are expected to require modern, flexible, multi-disciplinary facilities. This will reinforce the need for larger, hub-based estate rather than reducing overall floorspace requirements.

6.3. Air quality

Scenario 1: 9,800 homes	Scenario 2 14,700 homes
1	2

6.3.1. Air pollution caused by traffic is a significant issue locally, with Figure 6.1 showing 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 LNOS traffic impacting the 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 AQMAs (mapped here).

6.3.2. The previous Interim SA Report (2025) discussed how a means of minimising traffic through this problematic stretch of road would be to deliver a link road from LNOS joining the A1159 Warners Bridge roundabout at the southeast edge of the Airport (see Figure 6.2). However, such a road link would pass through LNOS in Rochford, and latest understanding is that there is no potential to plan for a comprehensive LNOS, i.e. the latest assumption is that LNOS in Rochford (to the west) and Southend (to the east) would be planned for as two separate developments separated by around 1km (Garon Park), as discussed in Section 5.

6.3.3. It is not clear that this is a significant issue, because even with a new strategic link road under a 'comprehensive LNOS' scenario the most direct route from the Southend element of LNOS to the A127 and on to Rayleigh, the A130 and the M25 would still be via the A1159 and Priory Park, but this is a matter that warrants ongoing scrutiny.

6.3.4. As part of this, there is a need to consider the potential for LNOS to achieve trip internalisation and 'modal shift' in line with a 'vision-led' approach (NPPF para 109), including noting that – were a comprehensive cross-border LNOS to deliver the aforementioned link road – it would be in the form of a bus and cycle priority 'sustainable transport corridor' linking to Southend Airport Station (via a new bridge). However, again it is not clear that this is a significant issue, because residents of LNOS in Southend would likely access rail services from stations in Southend rather than Southend Airport Station.

6.3.5. Finally, given the location of the two AQMAs an important consideration is the impact of LNOS in Southend in-combination with the possible LNOS in Rochford (1km to the west). It is understood that the intention is for LNOS in Rochford to secure a good degree of trip internalisation and modal shift via both walking connectivity to Southend Airport Station via a new bridge (discussed above) and high quality bus services linking to Southend. However, delivering the required infrastructure upgrades will be costly and challenging (including due to physical challenges with upgrading key junctions). This further highlights the importance of giving ongoing consideration to a comprehensive cross-border LNOS scheme.

6.3.6. In **conclusion**, taking a precautionary approach it is considered appropriate to flag a concern with Scenario 2, albeit acknowledging that Scenario 1 would generate additional problematic unmet need and there could be a risk of LNOS coming forward anyway in a sub-optimal way, e.g. without strategic planning for transport infrastructure upgrades. With regards to significant effects, whilst it is clear that road traffic affecting environmental quality is a key constraint to growth at and in the vicinity of Southend, given inherent locational and geographical constraints, there is also a need to factor-in improving air quality nationally. It is understood that air quality has improved at one of the AQMAs (A127 Bell junction) although the AQMA has not formally been withdrawn.

***Figure 6.1**: AQMAs and select other constraints across Southend*

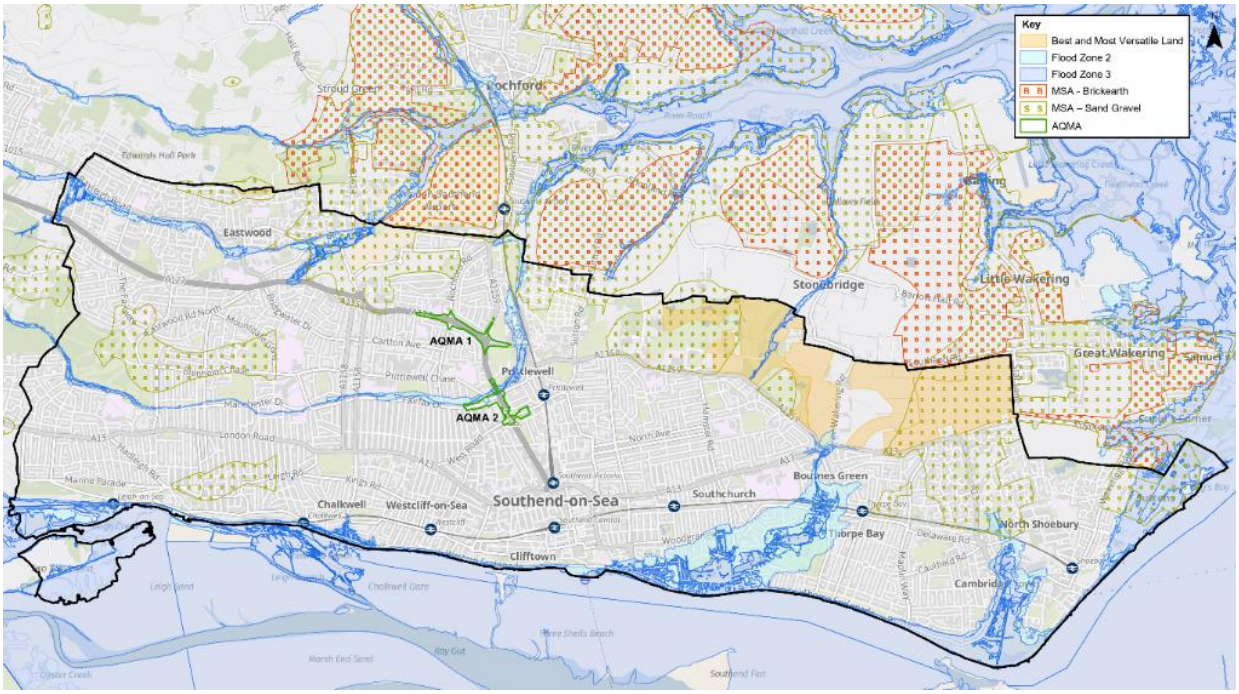
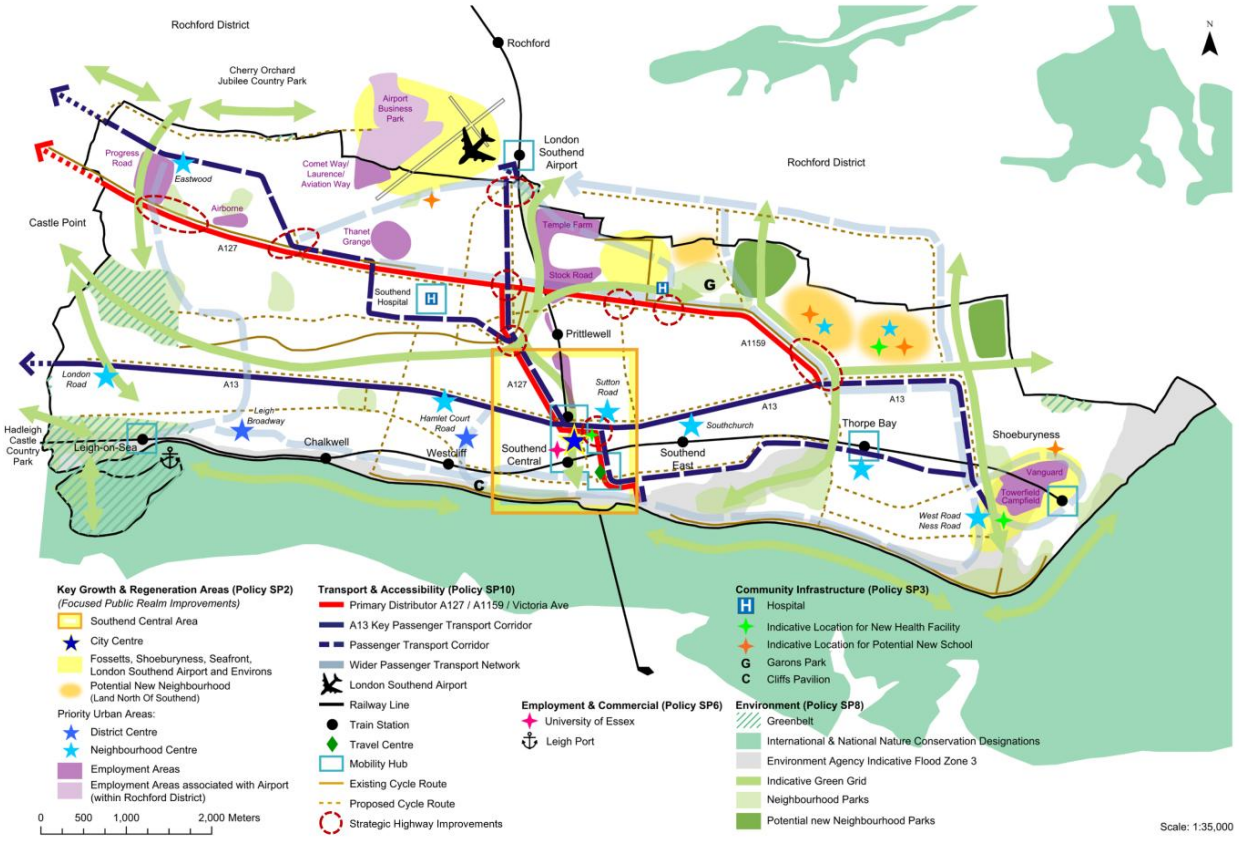


***Figure 6.2**: One of the two key diagram options previously presented for consultation in 2025, showing LNOS delivered with a strategic link road from the A13 to Southend Airport*



6.4. Biodiversity

Scenario 1: 9,800 homes	Scenario 2 14,700 homes
2	

6.4.1. International, national and local biodiversity designations are a key constraint to growth locally (see Figure 6.3). Whilst there would be 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. One key point to note is that there are no locally designated Local Wildlife Sites (LWSs) within LNOS and there is also very limited priority habitat. This suggests a degree of opportunity in biodiversity terms.[24]

6.4.2. If growth alternatively comes forward elsewhere within a constrained sub-region and/or via a sub-optimal piecemeal LNOS then it is possible to envisage that issues could arise and/or opportunities could be missed. In particular, a concern with piecemeal growth across LNOS could be in respect of planning for large-scale accessible green / blue infrastructure to minimise pressure on the Essex Estuaries Special Area of Conservation (SAC) and associated Special Protection Areas (SPAs) – see Figure 6.2.

6.4.3. A new Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) was recently published that identifies a need for all homes to contribute £476 per dwelling, and also states that large developments (500+ homes) are likely to require additional mitigation in the form Suitable Alternative Natural Greenspace (SANG). Current Natural England guidance (2021) advises this should be provided at a rate of around 8 ha per 1,000 population, which can likely be delivered by LNOS, but there is a need for further work to confirm this, and this is another masterplanning consideration moving forward. Natural England has indicated that in principle, given the Southend context, some element of SANG provision may be possible off-site via enhancement of existing green spaces in the city, but a detailed strategy has yet to be developed. It could feasibly be that SANG delivery would be easier under a scenario whereby LNOS delivers as a comprehensive cross-border scheme (not the current proposal and outside of the control of the Southend Local Plan).

6.4.4. The other key impact pathway for consideration, as discussed within the Southend Local Plan Habitats Regulations Assessment (HRA) is loss of functionally linked land, which specifically means loss of agricultural land used for foraging by overwintering waders that are one of the qualifying species for one or more of the coastal SPAs. However, surveys undertaken over multiple seasons in 2025 for a planning application on Bournes Green Chase (part of the wider LNOS) found that no wildfowl or waders were recorded and therefore the site did not possess any value in terms of wintering bird population size or species rarity. Also, even if loss of functionally linked land were to be demonstrated, the HRA explains that there is confidence that impacts could be compensated for by enhancement of nearby land outside of LNOS.

6.4.5. The final matter considered by the HRA is atmospheric pollution, but at the time of writing there is uncertainty ahead of further transport modelling to confirm to significant impacts on Benfleet and Southend Marshes SPA. It is noted, however, that the SPA is located at the southern edge of Southend, i.e. relatively distant from LNOS (see Figure 6.4).

6.4.6. In **conclusion**, there is support for Scenario 2 over Scenario 1, but there are nonetheless concerns under Scenario 2 given the extent of biodiversity constraint, and in particular the extent of international biodiversity designations covering the Essex Estuaries.

[24] Further evidence comes from the Essex Local Nature Recovery Strategy (LNRS, 2026), and in particular its map of Areas of Particular Importance for Biodiversity (APIBs). The map of APIBs shows there to be none within the LNOS area, within either Southend or Rochford, whilst there is a high density of APIBs Rochford and Castle Point to the west, including a network of nationally designated woodlands (Sites of Special Scientific Interest, SSSIs) associated with the Hadleigh to Hockley ridge.

***Figure 6.3**: Biodiversity and open space designations*

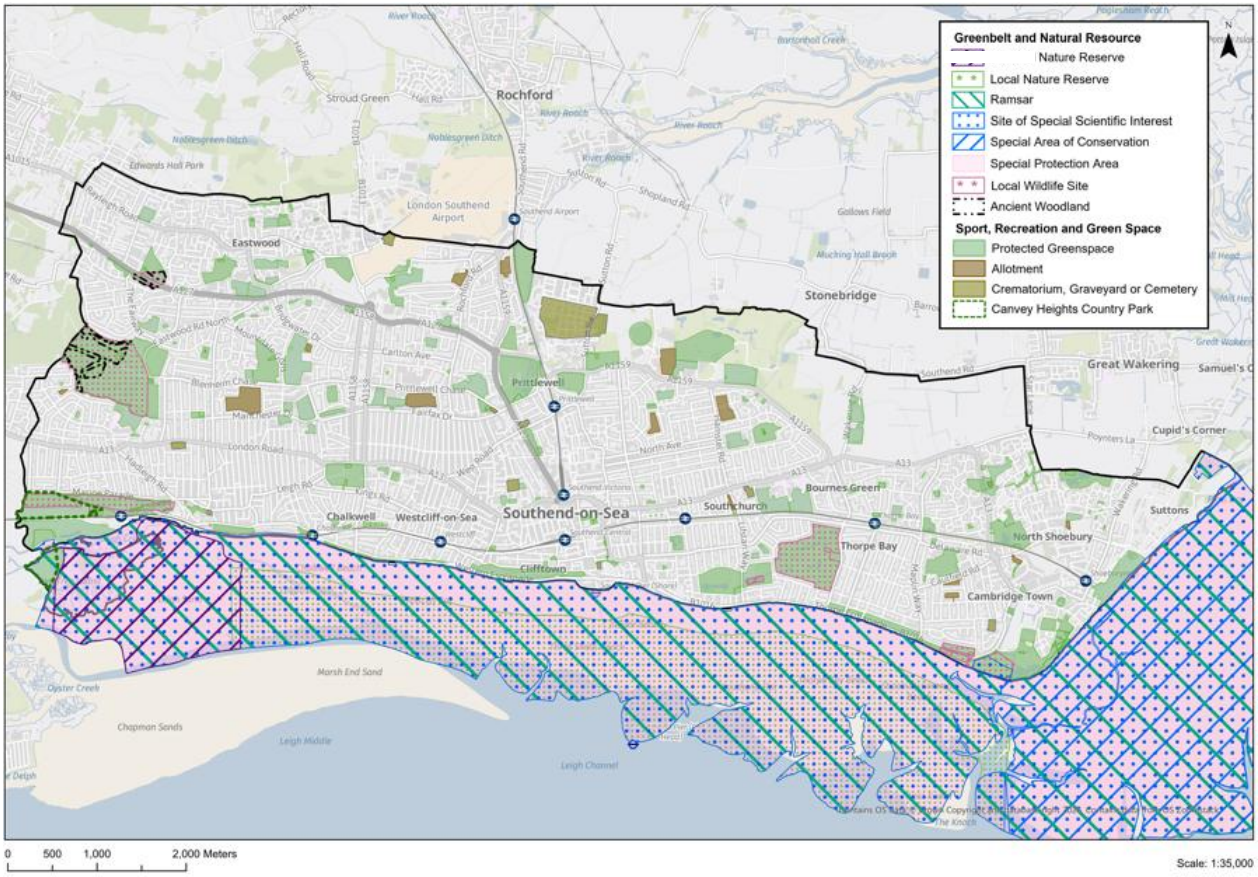
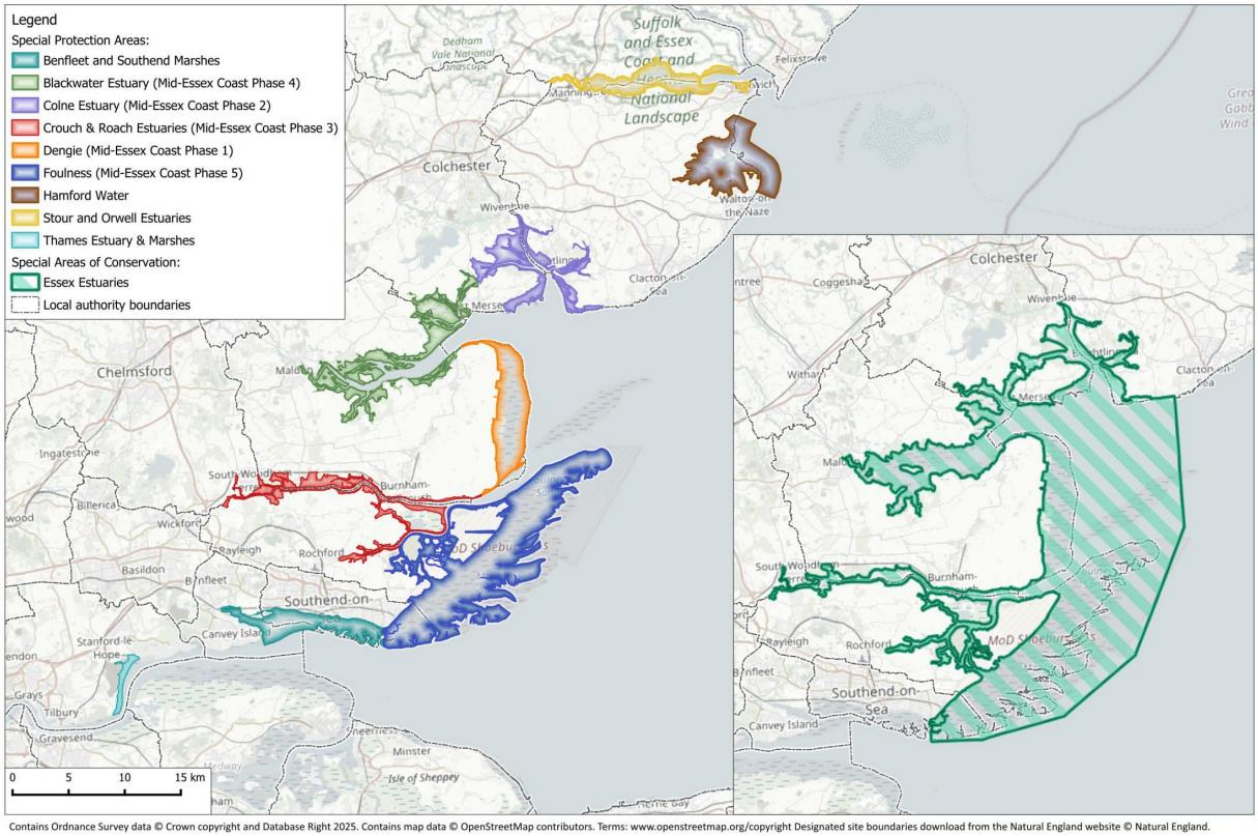


***Figure 6.4**: Figure from the Essex RAMS (April 2026, available here)*



6.5. Climate change adaptation

Scenario 1: 9,800 homes	Scenario 2 14,700 homes
=	=

6.5.1. Flood risk is a key consideration here, and there are sensitivities within the urban area, notably relating to tidal and fluvial flood risk but also relating to some significant surface water flood channels. Focusing on tidal and fluvial flood risk:

- The vast majority of Southend-on-Sea falls within Flood Zone 1, meaning that those areas have less than a 0.1% chance of river or tidal flooding within any given year.
- Approximately 3% of the City area falls within Flood Zone 2, meaning these areas have between 0.1%-1% chance of flooding from rivers in any year or between 0.1-0.5% chance of flooding from the sea in any year.
- Some 8% of the City area falls within Flood Zone 3, meaning the probability of flooding in any year exceeds 1% for rivers or 0.5% for the sea. Flood Zone 3 is split into 3a and 3b, with 3b land deemed as functional floodplain with a 5% probability of flooding. Only small areas of land are within flood zone 3b and these areas are not in contention for growth.

6.5.2. With regards to surface water flood risk, it is important to note that there was significant surface water flooding in 2014 exacerbated by a lack of capacity in the drainage system. The EA's central climate change allowances for the Combined Essex Management Catchment assume a 20-25% increase in the rate of 1% and 3.3% annual exceedance probability events by the 2070s. The equivalent upper end allowances predict an increase of such instances of between 35% and 45%. The IDP (2026) states:

"As surface water flooding poses a significant risk to large parts of the city, most growth sites should be assumed to require additional surface water flood risk mitigation measures within the development design… It is expected that flood management infrastructure will be incorporated into all emerging development proposals for all sites..."

6.5.3. 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. However, overall the proposed urban growth strategy under Scenario 1 is thought to give rise to limited concerns, including noting that the Environment Agency did not flag concerns through the Draft Plan consultation.

6.5.4. Having said this, there are a small number of proposed urban allocations that significantly intersect a flood risk zone (either fluvial / tidal or surface water), as discussed further as part of the 'whole plan' appraisal presented in Part 2 of this report. These are all sites where redevelopment can deliver clear benefits, and it is understood that flood risk can viably mitigated, notably through commercial uses on the ground floor and measures to ensure safe access and egress in the event of a flood, but there is a need to acknowledge that these sites could be challenging to bring forward without having to accept compromises.

6.5.5. As for Scenario 2, firstly there is no clear assumption that support for LNOS would enable a lower growth strategy in the urban area, thereby reducing pressure to intensify sites where there is an element of flood risk, but there could be some flexibility at the margins.

6.5.6. As for the LNOS site itself, the area is overall subject to limited flood risk; however, the flood risk zones are concentrated in the vicinity of the two existing roundabouts on the A13 at the southern edge of the site, in particular the key Bournes Green roundabout, which potentially creates a challenge (feasibly with implications for the cost of junction upgrades).

6.5.7. There is also a need to consider the risk of surface water runoff leading to worsened flood risk in the Southend urban area, including noting two 'critical drainage areas'.[25] However, there is clear potential to deliver high quality Sustainable Drainage Systems (SuDS) to avoid increased runoff rates and perhaps even achieve a betterment (the alluvial soils are understood to be suited to SuDS). This is another matter that needs to factor-in as part of ongoing masterplanning including consideration of green / blue infrastructure strategy.

6.5.8. In **conclusion**, the scenarios perform broadly on a par and neutral effects are predicted. There are some important areas of constraint at the southern edge of LNOS, but overall LNOS is arguably a good opportunity to avoid flood risk in a constrained sub-region.

***Figure 6.5**: Site options (including LNOS) alongside tidal and fluvial flood risk zones*

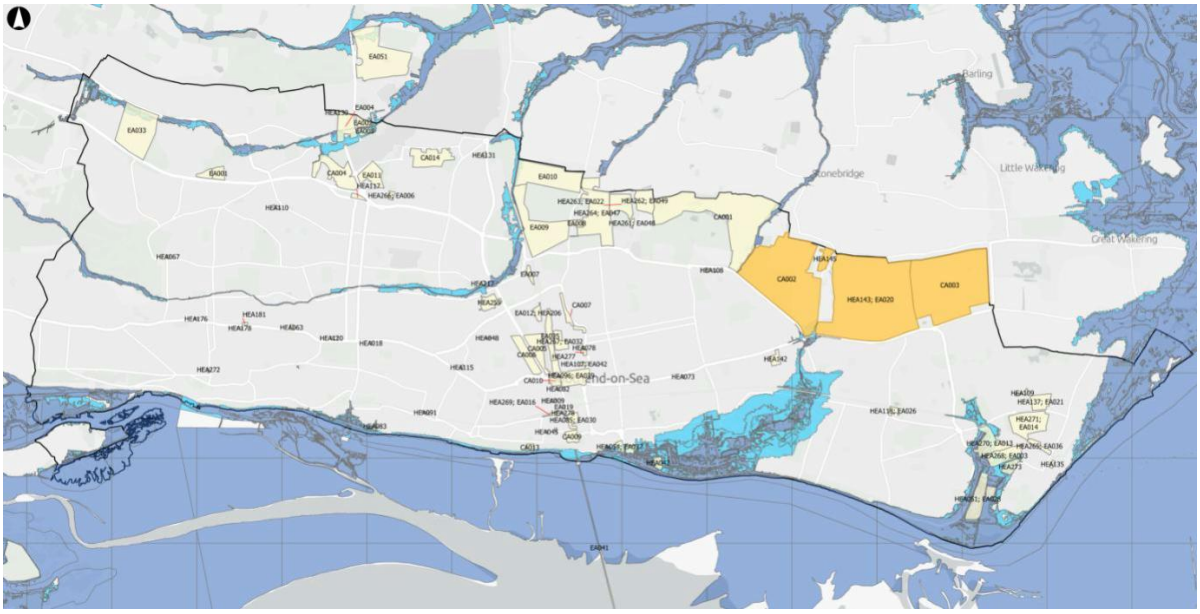
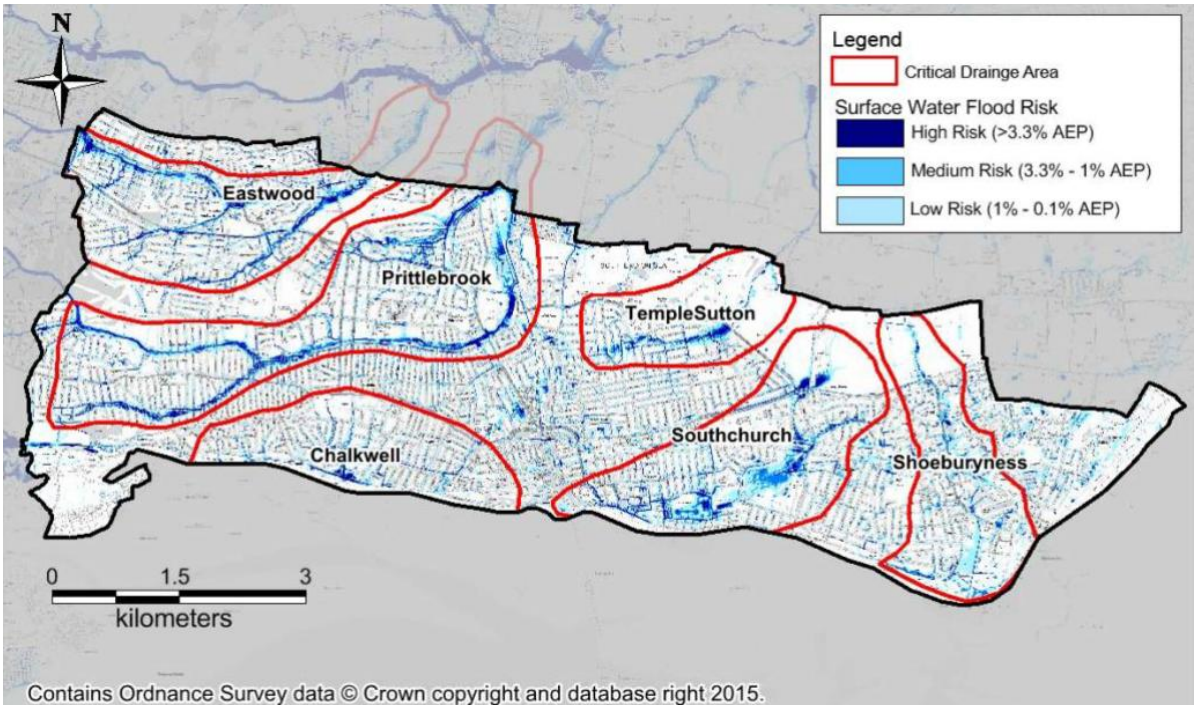


***Figure 6.6**: Surface water flood risk and Critical Drainage Areas*



[25] CDAs are areas of significant flood risk, characterised by the amount of surface runoff that drains into the area, the topography and hydraulic conditions of the pathway (e.g. sewer, river system), and the receptors (people, properties and infrastructure) that may be affected.. The Council uses CDAs to manage and prioritise potential flood mitigation and management options – it has an ongoing programme of works to tackle surface water flood risk, including hydraulic modelling studies for the central seafront and Chalkwell, and SuDS conceptualisation throughout the city centre.

6.6. Climate change mitigation

Scenario 1: 9,800 homes	Scenario 2 14,700 homes
=	=

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).

6.6.2. In this regard there is a case for supporting 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). However, in Southend the current proposal is not to require homes to be delivered as net zero developments, given viability parameters and competing policy priorities (e.g. affordable homes and infrastructure).

6.6.3. This is in contrast to the emerging Rochford Local Plan which, at the time of writing, does propose that all new homes should be delivered as part of net zero developments. This is in line with the approach advocated by Essex County Council, who responded to the Southend Draft Plan consultation in 2025 stating:[26]

"We… recommend SCC apply the latest pan Essex model policies and evidence in full within Policy DM9.1 in relation to Operational Energy and Carbon (Net Zero in Operation) and Embodied Carbon, as the most up to date and relevant evidence..."

6.6.4. The Southend Viability Study (2026) considers a 'sensitivity test' whereby the Local Plan does require net zero developments, and finds that this could be very challenging for some urban sites but that LNOS and Fossetts Farm: *"… remain viable under both sensitivity tests at 45% affordable housing. Under Sensitivity Test 1b, residual headroom remains at approximately £25,600 per dwelling for LNOS and £33,000 per dwelling for Fossetts Farm. These results indicate that both strategic sites retain capacity to accommodate the tested carbon reduction measures, subject to confirmation of their full infrastructure requirements."*

6.6.5. With regards to the two LNOS planning applications currently submitted or emerging, neither proposes anything of significance in terms of going beyond the minimum energy/carbon standards as set out in Building Regulations.

6.6.6. Finally, with regards to the ongoing possibility of a comprehensive cross-border LNOS (which, to reiterate, is not an option for the Local Plan but warrants ongoing consideration), this could feasibly give rise to an additional built environment decarbonisation opportunity, for three reasons: 1) there could be additional viability 'headroom' given economies of scale and greater potential for effective and efficient planning for the most costly elements of infrastructure, notably transport and community infrastructure; 2) a comprehensive cross-border scheme would amount to a nationally significant project such that external funding opportunities could be explored aimed at a flagship scheme that delivers innovation; and 3) there could be efficiencies and opportunities in terms of electricity infrastructure planning.

6.6.7. In **conclusion**, there is potentially support Scenario 2 from a perspective of minimising per capita greenhouse gas emissions from the built environment, but this is uncertain at this stage, such that on balance the two scenarios are judged to perform on a par.

6.6.8. 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, and prioritising net zero developments when preparing DM policies within viability parameters.

[26] It can be noted that achieving energy efficiency standards over-and-above the requirements of building regulations, and maximising onsite renewable energy generation to provide for residual onsite energy needs as far as possible, is increasingly seen as important for minimising peak strains on the electricity grid. This benefit is arguably now more important than carbon savings, given the new 2026 building regulations and an assumption that the national grid fully decarbonises over the coming years. The context is rapidly increasing strains on the grid from electrification, renewable generation and data centres.

6.7. Communities

Scenario 1: 9,800 homes	Scenario 2 14,700 homes
?	?

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 traffic congestion and loss of valued countryside / Green Belt (including noting that LNOS is mostly *not* grey belt). Also, a potential concern is around investment being funnelled towards LNOS to the detriment of investment in the existing urban area including in the City Centre.

6.7.3. However, it is important to consider the baseline scenario without an up-to-date Local Plan, and Scenario 1 whereby the Local Plan is adopted without LNOS such that it generates at least 18,300 homes unmet need:

- Baseline scenario – without an up-to-date local plan there would be ongoing pressure for growth within the Southend LNOS without the benefit of a plan / strategy, as evidenced by the current pending planning application for 2,000 homes, and the anticipated application for 3,000 homes to come forward either side of the site for 2,000 homes. Also, there would be major pressure on the Green Belt across South Essex beyond Southend, including within Rochford, because of the unmet need arising from Southend. Having said this, in the future there could potentially be an opportunity to plan effectively for housing needs across a wider area under devolution and potentially LGR.
- 18,300 homes unmet need scenario – firstly, the concern is that the Local Plan could be found to be unsound such that it cannot be adopted. However, even if the plan is adopted the unmet need would lead to pressure on the Green Belt across South Essex.

6.7.4. Also, there is a need to acknowledge the benefits that LNOS could bring to new and existing communities. A range of key opportunities have already been discussed, but in summary:

- Community infrastructure – LNOS in Southend can deliver three neighbourhood centres each with two primary schools, an all through / secondary school and a primary healthcare facility. Community infrastructure can be made easily accessible, and can help to meet the needs of parts of the existing Southend urban area that suffer from lack of provision.
- Garon Park is – is adjacent and whilst the golf course would reduce from 27 to 18 holes there could be opportunities for investment. It is understood that there could be additional opportunity were LNOS to be planned as a comprehensive cross-border scheme (not at an option for the Local Plan, but a matter for ongoing consideration), indeed work over recent years to consider a cross-border LNOS has sought to put an enhanced Garon Park at the centre of the vision, enhancing it as recreational focus for new and existing communities, with improved access via new public transport routes and active travel links, and enhancing its green/blue infrastructure role. However, on the other hand, as discussed above in Section 5.4 there is pressure to develop the golf course.
- Green / blue infrastructure (GBI) – as a strategic site there is an opportunity to deliver new homes alongside habitat creation and measures aimed at climate resilience in excess of what would typically be the case, and this can happen in parallel with the provision of new public open spaces for the existing and new community, and a GBI network can also deliver new high quality active travel connections. The current pending planning application proposes to deliver what would be the largest fully accessible park in Southend, but there is a need for a strategic approach to realise GBI opportunities in full.

- Active and public transport – LNOS within Southend can deliver a new transport corridor linking the neighbourhood centres and the existing urban edge, and priority offsite transport upgrades have also been identified, as discussed further below, albeit these are associated with major costs and, in turn, delivery risk at this stage. There would be additional opportunity and likely reduced risk were it possible to plan for LNOS as a comprehensive cross-border scheme, likely including a strategic east west sustainable transport corridor, but as discussed this is not an option for the Southend Local Plan.
- Affordable housing – subject to further work in respect of infrastructure costs there should be the potential to deliver 45% affordable housing, which is far in excess of what can typically be achieved at brownfield sites in Southend. See further discussion below.
- Family housing – this is a key opportunity at LNOS, with a view to delivering an overall housing mix in line with the established need for Southend (market and affordable).
- Existing communities – there is a need to plan strategically for LNOS with a view to protecting the character of rural lanes and villages, including a gap to Great Wakering.
- Employment – LNOS within Southend can deliver new employment floorspace that makes an important contribution towards the identified local need figure, although this will be within neighbourhood centres as opposed to strategic employment land.

6.7.5. In **conclusion**, whilst at the Regulation 18 Draft Plan stage the equivalent appraisal conclusion flagged a preference for Scenario 1, reflecting community concerns with LNOS, at this stage an 'uncertain' appraisal conclusion is recorded. This reflects factors including the pending / anticipated planning applications for LNOS in Southend and the fact that a plan-led LNOS in Southend can likely deliver a secondary school. However, the assumption is that LNOS in Southend would come forward as a stand-alone scheme as opposed to a comprehensive cross-border scheme (as discussed), likely leading to opportunities missed.

6.7.6. With regards to significant effects, on balance the conclusion is a 'neutral' effect. There are wide ranging communities arguments for and against both scenarios.

6.8. Economy and employment

Scenario 1: 9,800 homes	**Scenario 2** 14,700 homes
2	

6.8.1. Under Scenario 1 employment land supply would fall short of the identified need, as per the discussion in Section 5. Specifically:

- Under Scenario 2 total employment land supply is 68,400 sqm.
- 12,500 sqm of this total supply is from LNOS.
- The identified need is for between 58,600 sq.m (11.2 ha) and 68,300 sq.m (13.6 ha).
- Hence total supply without LNOS would be below the minimum need figure.

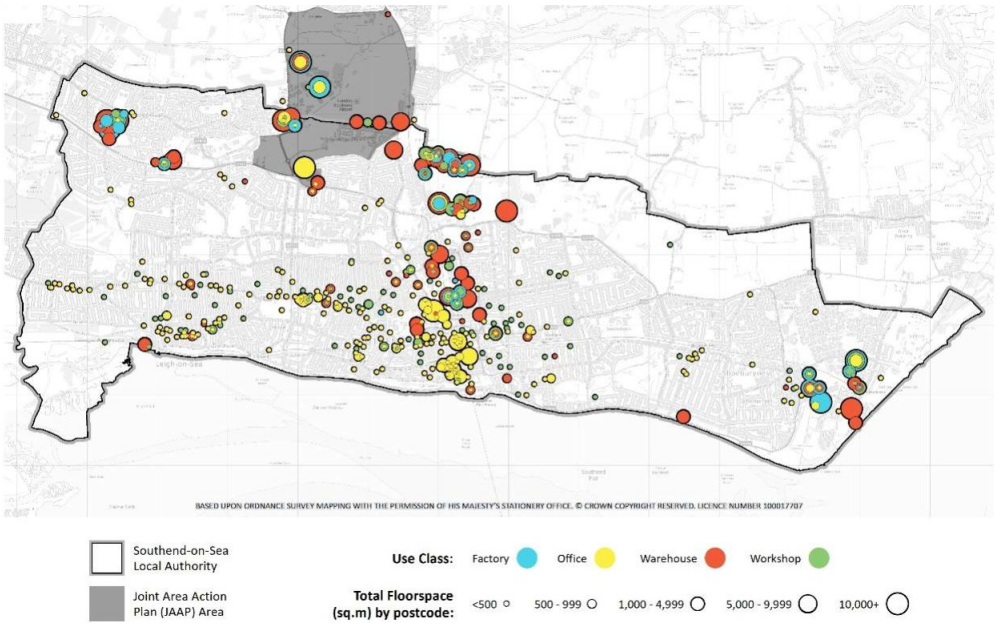
6.8.2. However, concerns may be somewhat allayed by an understanding that the emerging Rochford Local Plan may allocate the Rochford part of LNOS to include a 13.6 ha strategic extension to Temple Farm Industrial Estate adjacent to Southend (to be confirmed).

6.8.3. Final considerations under Scenario 2 are then: A) LNOS can be considered reasonably well-linked to employment given a location adjacent to a city and proximity to employment at and around an airport; B) there is a risk of problematic traffic congestion if transport mitigation is not realised (see discussion below), which could impact the local economy, including the operations of Southend Airport and the tourism industry; C) there would be many local jobs over the course of the construction phases of LNOS; and D) implications for city centre regeneration warrant consideration, although there is little clear reason to suggest that LNOS could serve to significantly divert investment.

6.8.4. The final matter for discussion is whether planning for LNOS as a comprehensive cross-border scheme (which is not an option for the Southend Local Plan but warrants ongoing consideration) could help to avoid issues / minimise risks and realise opportunities. Transport / traffic to the east and south east of Southend Airport is a key consideration, noting the key cluster of employment areas surrounding the airport, namely Airport Business Park to the west (within Rochford), Purdys Industrial Estate to the north east (within Rochford) and Temple Farm Industrial Estate to the east (within Southend but currently with a proposal to extend into Rochford District at the time of writing, as discussed).

6.8.5. In **conclusion**, there is a case for concluding a preference for Scenario 2, but employment land at LNOS would be limited and there are residual risks and uncertainties relating to transport infrastructure (looking cross-border), hence a neutral effect is predicted.

***Figure 6.7**: Existing employment land floorspace in Southend (Lichfields, 2026)*



6.9. Equality

Scenario 1: 9,800 homes	Scenario 2 14,700 homes
=	=

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. However, arguments in support of LNOS (Scenario 2) include:

- LNOS could be masterplanned with key issues and opportunities in mind, including relating to community infrastructure, transport infrastructure and green infrastructure. See discussion above of key opportunities for example a new Best Start Family Hub.
- LNOS could likely also deliver a level of affordable housing, as a proportion of total homes delivered, far in excess of what can typically be achieved in the urban area. There would also be excellent potential to deliver a good mix of housing to include family housing, specialist housing and accommodation for older people, supported housing and plots for self-build. As discussed, Scenario 1 would generate major unmet housing needs.
- The proposal is not currently to deliver Gypsy and Traveller pitches, but this could feasibly be a matter for further consideration. Whilst Southend does not currently have a need for Gypsy and Traveller pitches, at the time of writing it is understood that the Rochford Local Plan is set to generate a significant unmet need. It also follows that a comprehensive cross-border LNOS (not an option for the Southend Local Plan, but a matter for ongoing consideration) could represent an opportunity to plan for sub-regional needs.

6.9.2. With regards to the merits of Scenario 1, see further discussion in Part 2 of this report.

6.9.3. In **conclusion**, 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. A neutral effect is predicted.

6.10. Historic environment

Scenario 1: 9,800 homes	**Scenario 2** 14,700 homes
2	**1**

6.10.1. LNOS in Southend is subject to relatively limited historic environment sensitivity, in the context of large scale strategic growth options nationally. This was historically a rural and sparsely settled landscape, and whilst Southend in LNOS would extend either side of Wakering Road, along which there are two listed buildings, the road as a somewhat modern character. Historic England raised limited concerns through the consultation in 2025 (the primary concern raised was in respect of Fossetts Farm, given the scheduled monument here, namely Prittlewell Camp) and so, overall, LNOS in Southend is considered to represent a good opportunity to deliver growth in a way that minimises conflict with historic environment objectives. However, were LNOS to extend further in the future, i.e. extend into Rochford (recalling the importance of giving ongoing consideration to a possible cross-border scheme, albeit this is not an option for the Southend Local Plan, as discussed), there would some concerns in respect of encroachment into an expansive rural landscape associated with a degree of historic character. In particular, there would be a need to carefully consider Shopland Hall (where there formally stood a church) and avoid encroaching upon Shopland Road and Barrow Hall Road as characteristic rural lanes.

6.10.2. It can also be noted that Scenario 2 could conceivably 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.

6.10.3. In **conclusion**, there is considered to be a historic environment case for supporting LNOS as a relatively unconstrained location for growth within the sub-region, and given good potential to avoid and mitigate historic environment impacts via masterplanning. With regards to significant effects, whilst the equivalent appraisal in 2025 predicted a positive effect for both scenarios given the need to avoid a 'no plan scenario' whereby there is a 'tilted balance' applied when judging planning applications in the urban area, the situation has now changed in the context of the new NPPF published in August 2026, under which there is a 'default yes' in respect of planning applications in urban areas.

6.11. Homes

Scenario 1: 9,800 homes	**Scenario 2** 14,700 homes
2	 **1**

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 is provided for in time (e.g. under a sub-regional plan), 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. 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. Assuming that LNOS in Southend is able to deliver 45% affordable housing, as per the current proposal, then that would mean delivering 2,205 affordable homes in the plan period, which crudely averages out at 110 affordable homes per annum, which compares to recent delivery averaging under 50 homes per annum across Southend (see Figure 5.2) and, indeed, in the 2023/24 monitoring year the Council delivered zero affordable homes.

6.11.4. With regards to the need for AH, this is set out in the Housing Needs Assessment (HNA, 2026), which finds a need for 678 affordable rented homes per annum (up to 80% market rent), and within this there is a need for 497 homes per annum social rented affordable housing (below 80% of market rent). Additionally, there is an annual need for around 185 homes per annum to be made available as affordable home ownership products. The HNA also notably concludes: *"… the Council should seek to maximise the delivery of affordable housing for rent overall, given the overall scale of need. Where viable, and where grant funding allows, the Council should consider where Social Rent can be delivered as part of this, but this should not be at the expense of affordable housing overall."*

6.11.5. In short, LNOS could deliver a huge step change in AH delivery to address a major issue now and into the future under a scenario without LNOS. With regards to the potential to deliver affordable housing in the urban area, it is not uncommon for urban schemes to deliver zero affordable housing, and a significant proportion of growth is directed to lower viability areas including the City Centre, with the Viability Study (2026) concluding:

"The viability position for flatted development within the lower Value Area 1, most specific within and surrounding the city centre, is more challenging. Weaker results are generally associated with smaller schemes, higher-density developments exceeding six storeys and mixed-use schemes incorporating significant commercial floorspace. Nevertheless, a sufficient proportion of the tested typologies remain viable to support a differentiated affordable housing approach. The evidence indicates that a 10% affordable housing requirement, alongside the wider policy requirements of the emerging [Local Plan]..."

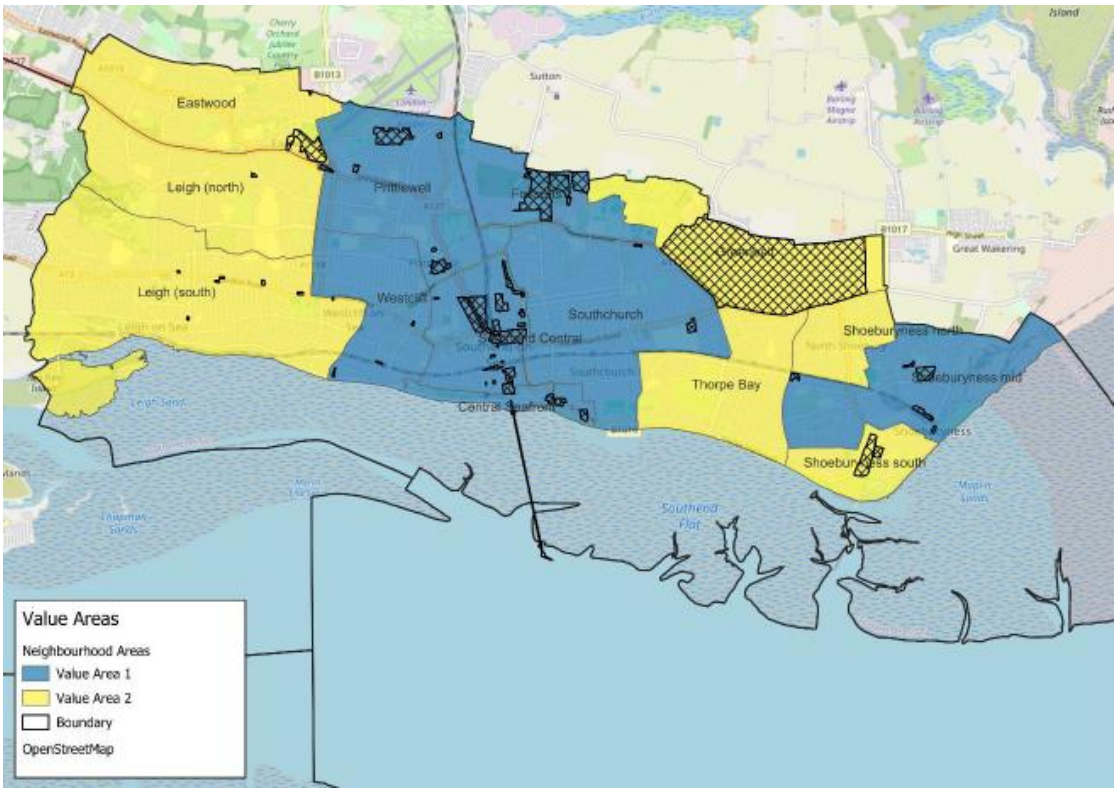
6.11.6. However, it is also important to note that the potential for LNOS to deliver affordable housing, to include a strong focus on affordable rented affordable housing, is potentially subject to change given uncertainties regarding the costs of infrastructure at this stage in the process, and at the time of writing (see the conclusions of the Viability Study).

6.11.7. A further consideration is that LNOS in Southend has the potential to deliver relatively early, with around 1,100 homes delivered within the ten years post plan adoption and 2,850 homes within the first 15 years. These figures are subject to change given ongoing infrastructure planning, but they can be contrasted to LNOS in Rochford, where it is currently anticipated that only 420 homes can be delivered within 10 years post adoption.

6.11.8. Finally, it is again important to note that the current proposal is to deliver LNOS in Southend as a stand-alone scheme that does not cross-over into Rochford District, although steps might be taken to avoid foreclosing options for future organic growth (but this could conflict with Green Belt objectives in terms of securing a new defensible boundary with a view to permanence, which is one of the two fundamental objectives of Green Belt policy). Were LNOS alternatively be planned for as a comprehensive cross-border scheme (which is not an option for the Southend Local Plan but a matter for ongoing consideration), then this would mean delivering additional homes in Rochford District to the north of Garon Park and potentially also additional homes to the north of Southend Road, but these parcels would deliver post 2045. It is also reasonable to suggest that planning comprehensively for LNOS now could potentially help with delivering the western extent of LNOS in Rochford.

6.11.9. In **conclusion**, whilst Scenario 1 would involve a step change in housing delivery, there is a need to conclude a significant negative effect given the scale of unmet need, and also given the challenge of delivering affordable housing in the urban area (particularly in areas with lower viability). Scenario 2 performs much better, and it can be suggested that the Council would be doing all it could to provide for needs locally (given that the potential to deliver a cross-border scheme is outside of the Councils control, in the context of the requirement to submit local plans by 31st December 2026), but there would still be *at least* 13,400 homes unmet need that would likely stay unmet, at least ahead of a future strategic plan that provides an opportunity to consider strategic growth locations across the sub-region.

***Figure 6.8**: Allocations overlaid on viability areas (from the Viability Study, 2026)*



6.12. Landscape

Scenario 1: 9,800 homes	**Scenario 2** 14,700 homes
=	**=**

6.12.1. LNOS within 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. It is also important to say that this is broadly a productive agricultural landscape, as discussed further below.

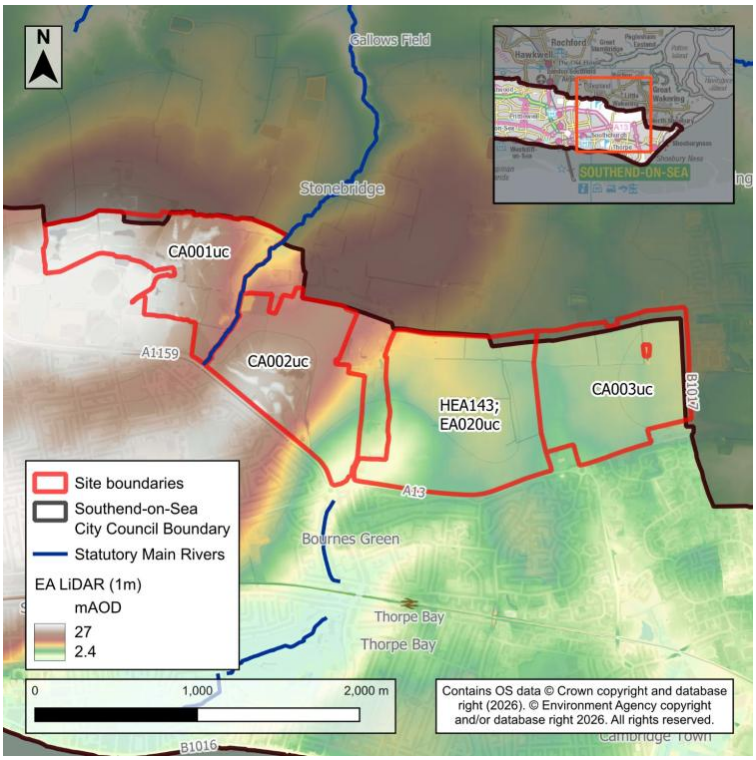
6.12.2. There are clear sensitivities from a Green Belt perspective, recognising that LNOS within Southend is primarily not grey belt, and given that the London Green Belt was purposefully extended to include land north of Southend. Green Belt is not a landscape designation, but it is clearly the case that there are links between landscape objectives and the two essential characteristics of Green Belt (NPPF paragraph 142), namely openness and permanence.

6.12.3. In this regard, a concern is that there could be future pressure to expand LNOS, including with a view to viably delivering infrastructure, leading to sub-optimal development creep/sprawl. The available evidence concludes that whilst LNOS in Southend mostly makes a strong contribution to Green Belt purposes the effect of LNOS in Southend would not be to 'fundamentally undermine' the Green Belt when considered at the scale of the plan area. However, there is also a need to consider the in-combination effect of LNOS in Southend alongside the possibility (at the time of writing) of LNOS in Rochford. The possibility of LNOS growth across the two areas leading to a reasonably rounded urban edge and securing strong containment (to ensure permanence of the Green Belt) can be envisaged, but this could be a matter for ongoing consideration moving forward.

6.12.4. Final considerations are: A) the current planning application for 2,000 homes within the Southend LNOS would involve a scheme that would be open to the wider countryside on three sides, i.e. such that there is a clear case for planning comprehensively for LNOS in Southend; B) the western part of LNOS in Southend comprises slightly raised land (Figure 6.9) crossed by a footpath, although there are not thought to be sensitive views of the land from the existing urban edge (the A1159 dual carriageway); and C) LNOS within Southend would be reasonably well contained to the west by a river corridor (Figure 6.9, recalling that Site CA001 is not proposed for allocation), which is associated with a bridleway and priority habitat, but containment is arguably weaker to the north (Southend Road); and D) there is a need to carefully consider maintaining a landscape gap to the village of Great Wakering, including noting a pending planning application / potential allocation within Rochford District adjacent to the north of Shoeburyness (south of Poynters Lane).

6.12.5. In **conclusion**, there is a case for supporting LNOS in Southend as there is limited landscape sensitivity and good potential for mitigation, and the effect would be to reduce unmet need and therefore pressure on a constrained sub-region. For example, to the west the Hadleigh – Rayeigh – Hockley ridge is an important raised and wooded landscape associated with fragile settlement gaps. However, there are some concerns including in respect of containment and the gap to Great Wakering. On balance the scenarios are judged to perform on a par and neutral effects are predicted.

***Figure 6.9**: Elevation in the vicinity of LNOS (from the SFRA)*



6.13. Soils and resources

Scenario 1: 9,800 homes	**Scenario 2** 14,700 homes
1	**2**

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 new national agricultural land quality dataset (2026) shows LNOS to comprise grade 2 quality land, such that it is the second highest grade of land nationally (the previous dataset suggested grade 1 quality land). This is in the context of the great majority of agricultural land across South Essex being grade 3b quality, such that it is the fourth highest grade of land nationally and not classed as 'best and most versatile'. However, there is also a need to note that much of LNOS within Southend has been surveyed in detail and found to comprise a mix of grades 2, 3a and 3b.[27]

6.13.3. Another consideration is that development would risk sterilisation of known minerals deposits (brickearth). However, it is not clear that minerals extraction would ever be viable in this area, including noting BMV agricultural land, and minerals extraction ahead of development would lead to additional viability and wider challenges for delivering LNOS.

6.13.4. In **conclusion**, it is fair to flag a concern with LNOS under this heading notwithstanding Scenario 1 would generate major unmet need that leads to pressure for growth elsewhere.

6.14. Transport

Scenario 1: 9,800 homes	**Scenario 2** 14,700 homes
?	**?**

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, as discussed. It can be noted that the A127 was one of the first purpose built major car routes, opened in 1925.

6.14.2. LNOS in Southend has some merit in transport terms given: A) its scale which leads to the potential to deliver a mix of uses onsite and major infrastructure; B) a location adjacent to a city; and C) a location supportive of rail, bus and cycle connectivity to a degree.

6.14.3. Detailed work has been undertaken to model the traffic effects of LNOS, recognising that this is a key issue for residents and businesses and also recognising that traffic congestion significantly affects bus services and the attractiveness of cycling and walking. This has included consideration of a range of mitigation measures relating to road and junction upgrades, including specifically aimed at supporting bus services and active travel.

6.14.4. However, this is inevitably a challenging exercise given uncertainties at this stage including in respect of: A) the degree of modal shift that can be achieved by LNOS and also wider growth locations in the urban area; B) the achievability and viability of infrastructure upgrades given competing cost priorities, e.g. affordable housing, and uncertainties regarding funding sources and the sharing of costs; and C) growth elsewhere in the sub-region, most notably at LNOS in Rochford District which would impact in combination.

6.14.5. The Transport Assessment (2026) concludes as follows:

"… the Southend Plus [mitigation] package substantially mitigates the forecast impacts of growth, fully mitigating conditions in the AM peak and reducing PM peak impacts to a relatively minor residual level. When considered across both peak periods, the package is judged to provide an effective mitigation strategy for the higher growth scenario… The results are based on a proportionate forecasting approach…The forecast highway impacts are likely to represent a robust upper bound of future traffic conditions.

[27] Natural England raised limited concerns through the consultation in 2025, and stated: *"We are pleased that best and most versatile agricultural land (Grade 1, 2 and 3a of the Agricultural Land Classification) will be protected from irreversible damage where this is consistent with the full range of sustainability considerations… We recommend an overarching soils policy to require that wider development seeks to minimise the loss of best and most versatile agricultural land where possible. The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpins our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver. The plan should safeguard the long-term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future..."*

Overall, the assessment demonstrates that deliverable transport mitigation packages exist to support the levels of development proposed... The modelling therefore provides evidence that the Local Plan growth strategy can be accommodated on the transport network, subject to implementation of the recommended transport interventions."

6.14.6. This is a positive conclusion, notwithstanding inherent uncertainties. As part of this, there is also a need to acknowledge uncertainties regarding the timing of infrastructure upgrades, i.e. how they might viably be phased alongside development.

6.14.7. However, there is a need for ongoing scrutiny of alignment with 'vision-led' transport planning principles (NPPF para 109) and, in turn, there is a need to give ongoing consideration to the possibility of a comprehensive cross-border LNOS, notwithstanding this is not an option for the Southend Local Plan (as discussed). In particular, this is because past work to consider a comprehensive cross-border LNOS has explored the possibility of an east-west sustainable transport corridor, linking from the A13 at North Shoebury / Great Wakering to Southend Airport Station. This route would link a series of neighbourhood centres and also an enhanced Garon Park (where it might meet a north/south bus route) and involve a new bridge over the Prittle Brook and railway line to the east of the Airport. LNOS in Southend is relatively distant from Southend Airport Station (i.e. stations in Southend are closer), but a sustainable transport corridor could still assist with modal shift, e.g. in respect of travelling to a secondary school and accessing employment. Also, and more broadly, a comprehensive cross-border LNOS could assist with masterplanning aimed at trip internalisation and modal shift, and could lead to additional economies of scale and efficient sharing of costs (also feasibly the sourcing of outside funding) that serves to unlock additional onsite and offsite infrastructure including transport and community infrastructure. It could also help to minimise traffic through the problematic single carriageway section of the A1159 at Prittlewell Park (where there is an AQMA and little potential for upgrades including on account of a scheduled monument, as discussed).

6.14.8. In **conclusion**, there is a case for supporting Scenario 1 given the merits of focusing growth within a city located within a sub-region where transport connectivity is challenging (see further discussion of Scenario 1 in Part 2 of this report), and given the transport challenges and uncertainties associated with LNOS. However, on balance the conclusion is that the alternatives cannot be differentiated with any certainty. Factors include: A) unmet need is highly problematic in transport terms; B) the concern is that LNOS comes forward anyway in a piecemeal and sub-optimal way;[28] and C) there is ongoing potential for further work to explore how LNOS-related transport issues can be addressed and opportunities realised.

6.14.9. With regards to significant effects, there are concerns around a vision-led approach to transport planning locally and sub-regionally that accounts for the in-combination effects of the current emerging local plans for Southend, Rochford, Castle Point, Basildon and Thurrock (also Brentwood are commencing a new plan). However, given the conclusion of the Transport Assessment a 'moderate or uncertain' negative effect is predicted.

***Figure 6.10**: Required highways mitigation for Scenario 2 (from the TA, 2026)*



[28] For example, whilst the recently refused planning application for 2,000 homes safeguards a route linking to the east through the proposed parkland at the eastern edge of the site, a far preferable approach would be to comprehensively plan for LNOS in Southend, i.e. the planning application site plus land either side.

6.15. Water

Scenario 1: 9,800 homes	Scenario 2 14,700 homes
2	**1**

6.15.1. The equivalent appraisal presented within the Interim SA Report published alongside the Draft Local Plan in 2025 flagged uncertainties and the risk of a negative effect under both scenarios. This reflected limited available evidence and an understanding that planning for water supply (i.e. ensuring supply of potable water without impacting the water environment) and wastewater treatment capacity (to avoid capacity breaches, in either hydraulic or chemical terms, impacting the water environment) is increasingly seen as a key issue for local plan-making across the south and east of England, including given the inherent challenge of aligning local plan-making with water company strategy.

6.15.2. The Interim SA Report concluded: "… *it will be crucially important to gather evidence through the current consultation, with a view working with [the water companies] 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."*

6.15.3. High level consultation responses were then received from the two water companies and the Environment Agency that did not flag any major concerns but stated a need for further work, e.g. one of the water companies stated: *"For us to support housing provision it will be imperative that we work very closely, in co-operation and collaboration with both planners and developers to fully understand each development's water needs*."

6.15.4. However, the latest situation is that the Southend Water Cycle Study (WCS) highlights limited concerns, subject to appropriate mitigation being secured.

6.15.5. Beginning with water supply (or 'water resource availability'), the WCS concludes:

- Essex and Suffolk Water's Water Resource Management Plan (WRMP24) indicates that, without intervention, water supply deficits could arise within the Essex Water Resource Zone (WRZ) up to 2045 and beyond. Growth under the government's standard method is projected to be around 72% higher than the level of growth forecast by WRMP24. However, planned growth in Southend under Scenario 2 is below the WRMP24 forecast.
- Short- to medium-term deficits are expected to be managed through demand reduction measures, including leakage reduction, smart metering and improved water efficiency. While these measures should reduce forecast deficits, additional supply-side schemes are likely to be required in the longer term at a strategic scale with significant lead-in times.
- Existing abstractions within the city are mainly for agricultural and amenity uses (e.g. golf courses) and are considered to have a limited impact on water resources relative to water supply uses. Additional abstraction for public water supply may be required in future, depending on growth, climate change and the effectiveness of WRMP measures.
- The assessment is subject to uncertainty and further technical work is required to refine Southend-specific forecasts and quantify any future deficits. This expected to be addressed by Essex and Suffolk Water through future WRMP updates.

6.15.6. Two notable recommendations are: A) where strategic infrastructure upgrades are required, consideration should be given to phasing larger developments, particularly schemes exceeding 500 dwellings where Essex and Suffolk Water indicate this is necessary; and B) the Council should consider adopting a water efficiency policy targeting 100 litres per person per day by 2030; 80 litres per person per day by 2035; and a minimum of three BREEAM Wat01 credits for non-residential development. Strategic schemes such as LNOS are potentially well suited to delivering measures aimed at water efficiency.

6.15.7. Final considerations are that: A) data centres may impact water supply within the region; and B) approximately 30% of the water supplied in the Essex WRZ comes from outside of Essex (which can reach 50% in dry years), of which 20% comes from the Lea Valley reservoirs, which leads to uncertainties given anticipated growth in/around London.

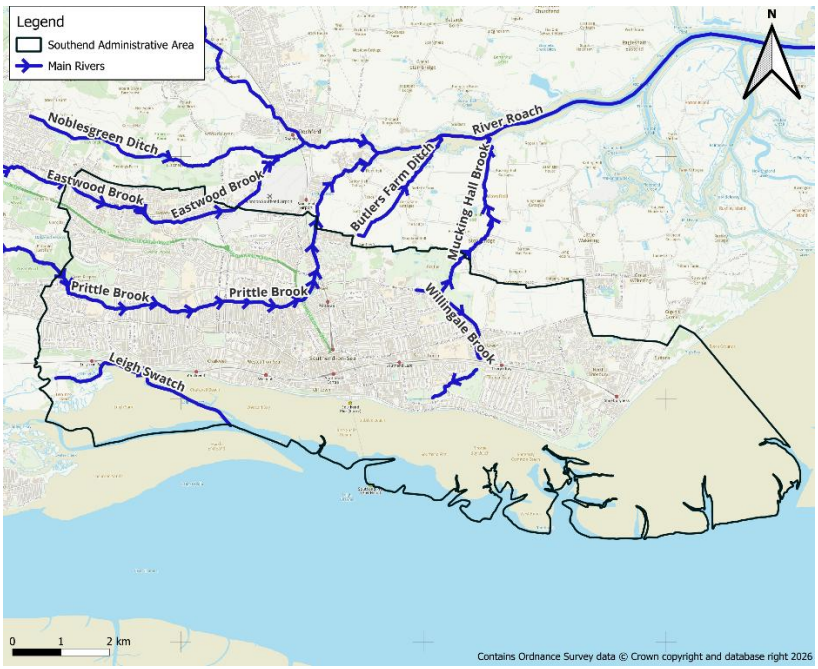
6.15.8. With regards to wastewater treatment capacity:

- Southend WRC is forecast to have sufficient treatment capacity throughout the plan period under Scenario 2. However, there are uncertainties given the need to account for high water flows during wet weather and possible growth at LNOS in Rochford.[29] Plus there is a need to recognise that flows to treatment works can be reduced by a range of measures, e.g. the Anglian Water DWMP (2023) identifies Southend as one of two 'pathfinder' catchments where there will be a focus on "innovative" surface water management.
- Watercourses across the study area have Moderate ecological status and Fail chemical status, indicating limited environmental capacity for additional development. However, increased pollutant loads at Southend WRC could affect WFD objectives if unmanaged.
- The required wastewater treatment improvements are considered technically achievable, but will require advance planning and permitting. However, upgrades can take several years to deliver, making early planning and stakeholder engagement essential.

6.15.9. Two key recommendations are then as follows: A) phase development in consultation with Anglian Water and Rochford District Council where wastewater capacity constraints may arise; and B) promote SuDS and sewer separation where appropriate.

6.15.10. In **conclusion**, on balance it is appropriate to tentatively flag support for LNOS over the alternative scenario involving major unmet need and a risk of uncoordinated growth at LNOS. It appears that LNOS has merit in terms of the potential to link to a WCS with capacity although the situation is complicated once account is taken of high water flows during storm events such that there may be a need for upgrades with phasing implications. With regards to water supply, this is a larger-than-local issue to be considered at the scale of the Essex WRZ and so it is difficult to conclude a concern with Scenario 2. Neutral effects are predicted but there will be a need to review matters in light of Regulation 19 representations received from the Environment Agency and the water companies.

***Figure 6.11**: Main rivers in the sub-region (from the WCS, 2026)*



[29] The Southend IDP further explains: *"There remains headroom within the existing consented flow to accommodate the planned growth… Planned growth [will lead to] 54,415m3/d which is less than the consented [dry weather flow of] 60,000m3/d… It must however be noted that the capacity of the WRC to treat that additional flow is subject to review by Anglian Water. As rule of thumb the… treatment capacity of the works… is typically about 3 times the observed [dry weather flow]. Since in this case [it] is about twice the [dry weather flow], there might be constraints to accommodating the planned growth..."*

6.16. Growth scenarios appraisal conclusion

6.16.1. Table 6.1 presents a summary of the growth scenarios appraisal. This is in the form of an appraisal 'matrix' with a row for each of the sustainability topics (the SA framework) and a column for each of the growth scenarios. For each sustainability topic the aim is to both: 1) rank the scenarios in order of preference; and 2) conclude on significant effects.

6.16.2. Scenario 1 is the preferable scenario under only two topics, which is an indication that it potentially performs poorly overall. However, it is not the aim of this appraisal to reach an overall conclusion on which scenario performs best overall, because the appraisal is undertaken with no assumptions made regarding the degree of importance ('weight') that should be assigned to each of the topics in the planning balance. Rather, it is for the Council to assign weight to topics, consider and potentially question topic-specific appraisal conclusions, factor in additional issues/impacts as necessary, and then conclude on which scenario best represents sustainable development on balance.

6.16.3. The introduction of LNOS in Scenario 2 brings benefits because it: A) would reduce unmet housing need to ~13,400 homes; B) represents an opportunity to deliver homes alongside new infrastructure rather than relying on enhancing existing infrastructure, which has been case in recent years and brings with it major challenges; C) can deliver a large proportion of family and affordable homes; D) can provide new employment land; and E) is fairly unconstrained in some environmental respects, notably in terms of biodiversity and the historic environment and arguably water.

6.16.4. Also, without allocation of LNOS: A) major unmet housing need of ~18,300 homes would then lead to pressure for growth elsewhere in a constrained sub-region; B) the Southend Local Plan could risk being found unsound such that it cannot be adopted; and C) there would be a risk of LNOS coming forward anyway in a sub-optimal piecemeal manner.[30]

6.16.5. However, there are infrastructure constraints, most notably in terms of transport given inherent constraints to growth in South East Essex. Detailed work has been completed, as reported across a suite of key studies prepared for the Local Plan (Transport Assessment, Infrastructure Delivery Plan and Viability Assessment), but there remains uncertainty regarding the delivery and timing of the required mitigation.

6.16.6. There would also be infrastructure challenges under Scenario 1, including due to the viability challenges affecting urban redevelopment sites (particularly in lower viability areas within the City, where a significant proportion of growth is proposed); however, a headline consideration is in respect of the additional growth at LNOS under Scenario 2.

6.16.7. Also, it is important to be clear that LNOS is significantly constrained in terms of agricultural land, in that it comprises the primary area of higher quality (grade 2) agricultural land in South Essex, and it also comprises higher quality Green Belt, i.e. it is not grey belt.

6.16.8. Finally, it is important to consider the context of potential growth within Rochford District, with latest understanding (Sept 2026) being that LNOS in Rochford may deliver 3,500 homes (1,650 by 2045) either side of Sutton Road, such that there would be two LNOS schemes (Southend and Rochford) separated by around 1km (Garon Park).

6.16.9. Past work has explored potential comprehensive cross-border growth, to include a strategic sustainable transport corridor, but this would require additional growth in Rochford District. The Southend Local Plan cannot influence this, but the potential merits of comprehensive cross-border growth must be given ongoing consideration as far as possible.

[30] A planning application for 2,000 homes was recently refused and at the current time we await the outcome of call-in and potential appeal. Also, land either side is anticipated to shortly be the focus of a 3,000 home application.

***Table 6.1**: Reasonable growth scenarios appraisal summary*[31]

Topic	Scenario 1: 9,800 homes	Scenario 2 14,700 homes
	Order of preference (number) and significant effects (shading)	
Accessibility	2	1
Air quality	1	2
Biodiversity	2	1
CC adaptation	=	=
CC mitigation	=	=
Communities	?	?
Economy / employment	2	1
Equality	=	=
Historic env.	2	1
Homes	2	1
Landscape	=	=
Soils and resources	1	2
Transport	?	?
Water	2	1

7. The preferred growth scenario

Introduction

7.1.1. This section presents the response of Officers to the AECOM appraisal presented above, explaining why the preferred growth scenario – Scenario 2 – is considered to be justified. It is important to be clear that the statement below is not an appraisal, but rather a response to the appraisal presented in Section 6.

[31] 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, '=' used where the scenarios perform on a par, and '?' used where it is not possible to reach a conclusion); 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 neutral effect.

Officer Statement

7.1.2. The sustainability appraisal has highlighted the merits/ opportunities and potential impacts of both Scenario 1 and 2, with both performing generally well in a number of respects and areas where adverse impacts can arise.

7.1.3. Scenario 2 generally performs better in terms of providing for more housing and employment floorspace. It closes the gap between Local Plan housing supply and LHN, albeit with significant remaining unmet needs, and enables the Local Plan to meet a more optimal economic floorspace need. LNOS has the ability to provide significant affordable homes, nearly twice as much as has been provided across the city over the past 20 years. LNOS will also provide for a high proportion of family housing, rather than primarily flatted development, which is a characteristic of urban brownfield development.

7.1.4. Further, LNOS has the ability to deliver additional and new infrastructure given improved viability compared to development of smaller brownfield sites and, importantly, the land to deliver such facilities, including new schools, a health facility, significant parkland and transport mitigation. The delivery of more and new infrastructure is a positive, but where this infrastructure becomes more costly and complex under Scenario 2 the risk to delivery becomes inherently greater, especially linked to phasing of the development. Indeed, the transport mitigation associated with mitigating LNOS are costly and in the case of widening Priory Crescent feasibly difficult, but the local plan evidence has indicated possible.

7.1.5. Scenario 2 results in a number of impacts that have been considered and weighed in the balance. This includes the loss of high-quality agricultural land, likely loss of mineral deposits subject to prior extraction and the loss of 9-hole golf course.

7.1.6. The allocation would also result in a loss of a significant proportion of the Green Belt in Southend and encroachment on the surrounding countryside. The Southend Green Belt Assessment (2026) found that most of LNOS is Green Belt and not Grey Belt. The NPPF (2024) notes that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period (Para 145) and Exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means. If that is the case, authorities should review Green Belt boundaries in accordance with the policies in the Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan (Para. 146).

7.1.7. The Southend Green Belt Assessment (2026) concluded that allocating LNOS would not fundamentally undermine the Green Belt purposes of the remaining Green Belt in the plan area. Although the development sites form a substantial part of the Green Belt in Southend, the remaining Green Belt in the west, and a small proportion in the east of the city, would not be meaningfully impacted. Further, substantial Green Belt designation would remain in Rochford district which currently contains a large portion of the Southend city boundary.

7.1.8. Scenario 1 limits the main impacts of Scenario 2 in that it does not result in the loss of significant Green Belt land elsewhere in Southend, encroachment of the countryside, loss of agricultural land, potential loss of mineral deposits and ensures investment within Southend remains focused towards urban areas, assisting regeneration. However, it results in even more significant unmet housing needs, less employment floorspace and jobs within the area. Scenario 1 will result in significantly less affordable homes and family housing being provided over the plan period whereas Scenario 2 is more likely to deliver family and affordable homes due to land availability and viability.

7.1.9. After detailed consideration of the evidence base and balancing the findings of the Sustainability Appraisal and other supporting documents, the Proposed Submission Local Plan reflects Scenario 2, and the intention is to invite representations in relation to legal compliance and soundness at the Regulation 19 stage of plan making, prior to submission for independent examination.

Part 2: SA findings at this stage?

8. Introduction to Part 2

8.1.1. This part of the report presents an appraisal of the Proposed Submission Local Plan as a whole under the SA framework (i.e. the same 14 topics used to structure Section 6).

8.1.2. The appraisal essentially:

- Recaps the appraisal of Scenario 2 in Section 6 (i.e. the preferred growth scenario that forms the basis for the Local Plan).
- Expands where necessary (including accounting for details of the proposed approach to growth in the urban area, which is less a focus of the appraisal in Section 6).
- Additionally accounts for development management (DM) policies.

8.1.3. An aim is to avoid the repetition of text from Section 6. Also, in respect of DM policies, there is a need to acknowledge that planning applications within the urban area will now be considered under the national decision-making policies in the new NPPF (2026) with very limited weight will be given to local DM policies where they are materially inconsistent.

8.1.4. With regards to methodology, account is taken of the baseline situation (a significant effect is an effect *on the baseline*, which is not a static situation but rather one involving growth without a Local Plan), and various potential effect characteristics. For example, there is a need to consider short and long term effects, direct and indirect effects and the cumulative effects of the Local Plan in combination with other policies and plans.

9. The Proposed Submission Plan

9.1. Introduction

9.1.1. Each appraisal begins by recapping and potentially expanding upon on the appraisal of growth scenario 2. Secondly, consideration is given to ‘strategic policies’ and wider DM policies. Finally, each appraisal reaches a conclusion on the Local Plan as a whole.

9.2. Accessibility (to community infrastructure)

9.2.1. The appraisal in Section 6 concludes a **moderate or uncertain positive effect** for Scenario 2 and this conclusion also applies in respect of the Local Plan as a whole. With regards to LNOS, which is the focus of discussion in Section 6, it is considered to represent a considerable opportunity to deliver community infrastructure alongside new homes, albeit there is a need for ongoing scrutiny on ensuring opportunities are fully realised.

9.2.2. With regards to growth in the urban area, there are inherent constraints to delivering new community infrastructure capacity alongside new homes, but Section 5.4 discusses a number of targeted opportunities. Focusing on primary school capacity, the IDP finds that growth within the urban area and Fossetts Farm can be met through the expansion of existing schools, although this is a matter for ongoing scrutiny, e.g. noting the pending planning application on the edge of Shoeburyness where school provision is unclear.

9.2.3. With regards to policies, the first point to note are the requirements for LNOS, which require ongoing scrutiny and then monitoring from a viability perspective, with a view to ensuring that the Local Plan is adopted with a clear understanding of what it can and cannot deliver.

9.2.4. With regards to wider policies, the key point to make is that the proposed neighbourhood-specific policies are strongly supported in that they respond to locally specific issues and opportunities. Strategic Policy SP3 (Securing and Improving Infrastructure) then commits to an “infrastructure-led approach” to growth across the City, but there is a need to acknowledge that there are challenges to delivering new homes alongside infrastructure within the urban area, particularly in the lower viability areas.

9.3. Air quality

9.3.1. The appraisal in Section 6 concludes a **neutral effect** for Scenario 2 and this conclusion also applies in respect of the Local Plan as a whole. With regards to LNOS, which is the focus of discussion in Section 6, there is a clear risk of increased traffic through one or more of the two designated Air Quality Management Areas (AQMAs), with key issue being traffic through the single carriageway section of the A1159 at Priory Park.

9.3.2. With regards to growth in the urban area, the discussion in Section 5.4 serves to demonstrate that proposed densities have responded to accessibility and transport connectivity, and there is support for higher growth in the city centre, although it is less clear that there is a transport case for higher growth in Shoeburyness. New proposed allocations correlate with existing sustainable travel corridors, but few are associated with a clear transport opportunity in terms of supporting bus services, cycle routes in line with the LCWIP or increased permeability; also, car parking is a matter for ongoing consideration.

9.3.3. With regards to policies, at LNOS the key requirement is: *"Provide highway solutions to address the impact on the local and wider strategic road network, including junction and capacity improvements and provide new public transport, and active travel corridors to provide bus permeability and connect the new neighbourhood with key destinations including Southend city centre, open spaces, education, train stations and health facilities.* This warrants ongoing scrutiny aimed at securing trip internalisation, modal shift away from the private car and highways upgrades to mitigate the effects of increased traffic.

9.3.4. With regards to wider policies, Policy DM9.3 (Environmental Protection) includes criteria relating to air quality but these are fairly standard requirements in the national context. Within Prittlewell, the following is an aspiration more so than a requirement: *"Opportunities for urban greening along the A127 primary distributor will be encouraged to enhance the local environment and help to improve local air quality and enhance quality of life for residents, particularly in Air Quality Management Areas (AQMAs)."*

9.3.5. Finally, it is noted that certain allocations are adjacent to a main road or a railway line, but this has factored into density and site specific requirements, e.g. Site HEA091.

9.4. Biodiversity

9.4.1. The appraisal in Section 6 concludes a **neutral effect** for Scenario 2 and this conclusion also applies in respect of the Local Plan as a whole. A key consideration is avoiding recreational impacts on the Essex Estuaries and, in this regard, plan-making at the current time has the benefit of a recently updated management strategy (RAMS), although this is another matter for ongoing consideration including relating to SANG delivery.

9.4.2. With regards to growth in the urban area, the discussion in Section 5.4 does not serve to highlight any significant site-specific issues or opportunities in terms of biodiversity. However, there is a need for ongoing consideration of the cumulative effects of growth in terms of recreational pressure on the Essex Estuaries and also potentially air pollution impacts as a result of traffic (potentially in combination with growth in Castle Point).

9.4.3. With regards to policies, at LNOS there is a requirement for *"a country park and a series of green and blue landscape corridors along existing brooks/ ditches to provide water management, enhanced biodiversity and habitat creation…"* The policy does not reference SANG delivery, but under Policy DM8.3 (Southend Foreshore) there is the following requirement: *"New residential development, particularly… comprising developments of 500 dwellings or more, may be required to provide project level mitigation, including [SANG]."*

9.4.4. With regards to wider policies, attention focuses on Policy DM8.2 (Urban Greening Factor), as there are potentially development viability implications (and, in turn, implications for the achieving wider objectives, e.g. affordable housing, infrastructure). However, the Viability Study (2026) works from the assumption that: *"that any cost impact [is] marginal."* It is noted that viability studies elsewhere (e.g. Rochford) highlight that the UGF can create a challenge in the context of high density urban schemes due to expectations of green roofs.

9.5. Climate change adaptation

9.5.1. The appraisal in Section 6 concludes a **neutral effect** for Scenario 2 and this conclusion also applies in respect of the Local Plan as a whole. LNOS is overall subject to limited constraint, but there is flood risk in the vicinity of key junctions requiring upgrades, and within the urban area there are a small number of sites subject to flood risk.

9.5.2. Focusing on growth in the urban area, Section 5.4 serves to flag the following new proposed allocations as subject to greatest constraint (all located in Southend Central):[32]

- HEA042 (Former Gas Works, Eastern Esplanade; 150 homes) – retention of parking with potential for mixed use development particularly to the north of the site. The site has previously had planning permission. The issue here is tidal flood risk.[33]
- CA012 (The Kursaal; 26 homes) – was previously not proposed for residential use in 2025. The proposal is for leisure / cultural / tourism uses to provide visitor attractions, with the potential for enabling housing to the rear. The issue here is tidal flood risk.[34]
- CA007 (Sutton Road; 125 homes) – an existing allocation and partly permitted. Within 400m of a railway station and gross density is 144 dph. Previously expected to deliver 150 homes in 2025. There is significant surface water and groundwater flood risk.

9.5.3. These are all sites where redevelopment can deliver clear benefits, and it is understood that flood risk can viably mitigated, but there is a need to acknowledge that these sites could be challenging to bring forward without having to accept compromises.

9.5.4. With regards to policies, at LNOS the policy requirements do not reference flood risk or drainage, but there is a reference to blue infrastructure (as discussed).

9.5.5. With regards to wider policies, a key consideration is factoring the potential to deliver high quality Sustainable Drainage Systems (SuDS) across the allocations including urban allocations, as far as possible. Also, there is a need to factor-in contributions to flood defences. Policy DM9.4 (Flood Risk and Sustainable Drainage) is a fairly standard policy in the national context; however, for two neighbourhoods there is a requirement as follows: *"Coastal defences will be upgraded to mitigate flood risk and climate change impacts and in line with the Thames Estuary 2100 strategy."* Only two site-specific policies in the urban area reference flood risk and none reference SuDS, such that there could be the potential for further work to confirm site capacities accounting for flood risk considerations.

9.5.6. A final consideration is urban densification leading to risks in respect of the urban heat island effect and resilience to future heatwaves, but it is difficult to conclude any significant concerns (and application of the Urban Greening Factor may assist).

9.6. Climate change mitigation

9.6.1. The appraisal in Section 6 concludes a **moderate or uncertain negative effect** for Scenario 2 and this conclusion also applies in respect of the Local Plan as a whole. LNOS could potentially represent a built environment decarbonisation opportunity but this is not currently a focus of policy (given competing policy priorities wit cost implications).

[32] There are also permitted sites subject to flood risk, most notably HEA051 at Shoeburyness, which comprises an area that has historically been left undeveloped presumably on account of the land entirely falling within flood zone 3.
[33] The Level 2 SFRA notably concludes: *"… The site is shown to be protected by tidal defences; however, the entire site is shown to be at risk in the defended 0.5% AEP and 0.1% AEP climate change events with significant depths across the site [and] the site is at residual risk of tidal flooding due to breach or overtopping of the tidal defences. Breach modelling has shown that breaches during the larger flood events provide little to no warning time at the site."*
[34] The Level 2 SFRA notably concludes: *"… The site is shown to be protected by tidal defences… but these are overtopped during the climate change events… The site is at residual risk of tidal flooding due to breach or overtopping of the tidal defences… breaches during the larger flood events [would] provide little warning time… There is considerable surface water ponding… showing an increase with climate change shown the site. Surface water risk… may impede some potential access and escape options."*

9.6.2. With regards to policies, the possibility of requiring all developments to come forward as net zero developments was discussed within the Interim SA Report in 2025, and Essex County Council strongly supports a policy requirement for net zero developments, but given viability challenges and competing cost priorities it is difficult to see that this is a realistic possibility. The Local Plan Viability Study explains that DM9.1 (Sustainable Design and Construction) *"does not go further than the Future Homes standard, and this soon to be national mandatory requirement…"* It considers a 'sensitivity test' whereby net zero developments are required and finds that for some development typologies this could tip the balance such that developments move from being marginally viable to unviable.

9.7. Communities

9.7.1. The appraisal in Section 6 concludes a **neutral effect** for Scenario 2 and this conclusion also applies in respect of the Local Plan as a whole. LNOS clearly generates concerns amongst the local community but is associated with a range of key opportunities.

9.7.2. With regards to Fossetts Farm, 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).

9.7.3. With regards to growth in the urban area, 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 three consultations and wider engagement. Focusing on higher growth areas:

- Southend Central – is naturally a key focus of growth. There has been significant recent work to confirm 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 and employment

9.8.1. The appraisal in Section 6 concludes a **neutral effect** for Scenario 2 and this conclusion also applies in respect of the Local Plan as a whole. The key point is that the proposed growth strategy provides for employment land needs as understood from the ENA (2026).

9.8.2. It is noted that the Interim SA Report (2025) recommended that consideration be given to boosting employment land supply, and that recommendation has been actioned.

9.8.3. In terms of policies, at LNOS the requirement is for: *"A minimum of 12,500 sqm employment floorspace (E(g)/ B Use Class) and other commercial floorspace and services to create vibrant local centres."* Also, at other proposed allocations there is detailed understanding of the employment land floorspace that will be delivered, albeit matters can be up for negotiation at the planning application stage, including in light of viability challenges.

9.8.4. Secondly, there is a need to note DM6.2 (Employment and Skills), which is a focus of the Viability Study because there are cost implications such that it must be considered in the round alongside other policy requirements within the context of development viability parameters. The costs involved are relatively modest and reflect the Essex Developers Guice to Infrastructure Contributions in regard to provision of skills training/ placements.

9.9. Equality

9.9.1. The appraisal in Section 6 concludes a **neutral effect** for Scenario 2 and this conclusion also applies in respect of the Local Plan as a whole. There are positives associated with LNOS, including relating to family housing, affordable housing and potentially specialist housing, and it is difficult to identify clear tensions resulting from the growth strategy overall.

9.9.2. With regards to the urban growth strategy:

- 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 are a range of residual uncertainties given viability and wider delivery challenges. Further considerations include: 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. facilities 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, but 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 one factor.

9.9.3. With regards to policies, numerous 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)).

9.9.4. Focusing on specialist accommodation, the Viability Study (2026) notably finds: *"The assessment identifies continuing viability challenges for retirement living and extra care housing. All tested older person accommodation typologies generate deficits once policy requirements are applied and remain unviable even under improved market conditions. The findings suggest that applying standard residential affordable housing requirements to these specialist forms of accommodation would be likely to compromise delivery."*

9.9.5. 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 Section 6 concludes a **neutral effect** for Scenario 2 and this conclusion also applies in respect of the Local Plan as a whole. There is support for LNOS as it represents an opportunity to bring forward new homes in a relatively unconstrained area.

9.10.2. Elsewhere a key issue is Fossetts Farm, given close association with a scheduled monument, but there are numerous references to the scheduled monument within area and site-specific policy, including the following requirement for the primary new proposed allocation: *"Development proposals to be supported by a Heritage Impact Assessment to address impacts on Scheduled Ancient Monument as appropriate."* It seems unlikely that the effect of the assessment would be to reduce the capacity of the site, or otherwise significantly affect masterplanning, but this is potentially a matter for ongoing consideration.

9.10.3. With regards to urban growth, 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. Also, there is need to recall the baseline situation whereby growth continues to come forward under the presumption in favour of sustainable development.

9.10.4. With regards to policies, 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.

9.10.5. A total of six new proposed allocations are required to deliver a Heritage Impact Assessment at the planning application stage, in line with the consultation response received from Historic England at the Draft Plan consultation stage in 2025.

9.11. Homes

9.11.1. The appraisal in Section 6 concludes a **moderate or uncertain negative effect** for Scenario 2 and this conclusion also applies in respect of the Local Plan as a whole. This reflects the extent of unmet need, albeit there is support for LNOS as it can make a major contribution to providing for needs including family and affordable housing.

9.11.2. With regards DM policies, the housing focused policies are highly significant because of their cost implications, as explored in detail through the Viability Study (2026). The conclusion of the Viability Study is shown below, and it can be seen that three of the six policies with the greatest bearing on viability relate to housing. Within this it is affordable housing that has the greatest bearing, and the Viability Study models the effect of alternative affordable housing requirements, leading to the following headline requirement in Policy DM5.1 (Affordable housing) (N.B. there is a specific requirement for LNOS):

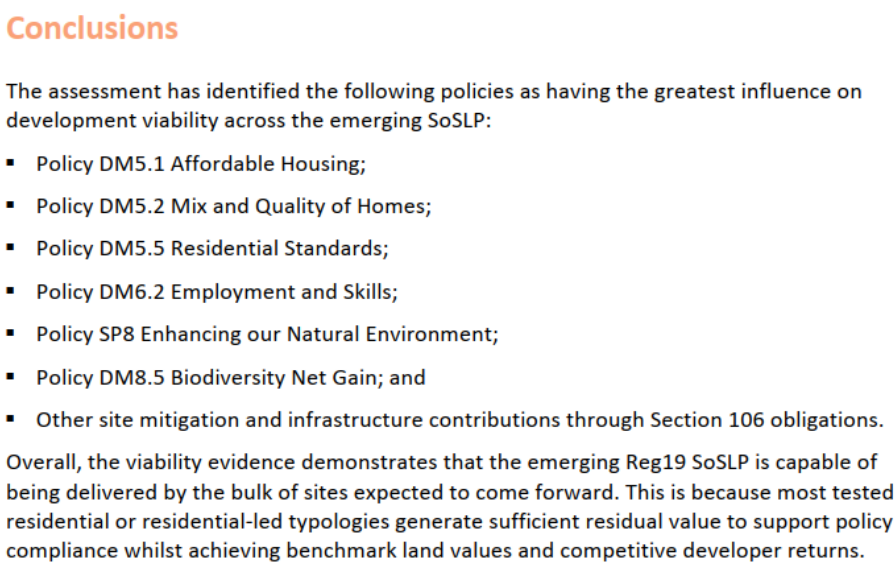
"Schemes of 10 dwellings or more will make an affordable housing or key worker provision of not less than 30% of the total number of units on site, excluding brownfield flatted development within Value Area 1 where an affordable housing or key worker provision of not less than 10% of the total number of units on site will be applied."

9.11.3. The requirement is also for no less than 80% of all new affordable housing to be affordable housing for rent, and following a recommendation there is also now a policy requirement in respect of the proportion that should be social rented affordable housing.

9.11.4. Policy DM5.7 (Housing and Accommodation for Older People) is also a key policy in light of evidence showing a need for:

- 1,400 units housing for older people (retirement homes for sale and for rent or extra care).
- Around 650 units within residential/nursing homes – the estimated accommodation with care net need to 2040 is up to a maximum of c.630 to 670 units, but within this it is recognised: A) the estimated net need for residential care to 2040 is negative; and hence B) the majority of the estimated net need for nursing care to 2040 is care homes with nursing. This reflects the growth in the 75+ household population to 2040 (47%) and the projected increase in complex care needs amongst this population.

***Figure 9.1**: The conclusion from the Viability Study (2026)*



Conclusions

The assessment has identified the following policies as having the greatest influence on development viability across the emerging SoSLP:

- Policy DM5.1 Affordable Housing;
- Policy DM5.2 Mix and Quality of Homes;
- Policy DM5.5 Residential Standards;
- Policy DM6.2 Employment and Skills;
- Policy SP8 Enhancing our Natural Environment;
- Policy DM8.5 Biodiversity Net Gain; and
- Other site mitigation and infrastructure contributions through Section 106 obligations.

Overall, the viability evidence demonstrates that the emerging Reg19 SoSLP is capable of being delivered by the bulk of sites expected to come forward. This is because most tested residential or residential-led typologies generate sufficient residual value to support policy compliance whilst achieving benchmark land values and competitive developer returns.

9.12. Landscape

9.12.1. The appraisal in Section 6 concludes a **neutral effect** for Scenario 2 and this conclusion also applies in respect of the Local Plan as a whole. There is support for LNOS as a location subject to relatively limited landscape constraint but there are some challenges.

9.12.2. Notable site-specific policy requirements for LNOS are as follows: A) The new neighbourhood will constitute new urban villages and be designed sensitively to take full account of topography and landform and to successfully integrate with the existing urban areas of Southend; and B) Provision of a country park and a series of green and blue landscape corridors along existing brooks/ ditches. It is also noted that there is a requirement for the development to come forward in line with an agreed concept framework. However, it is recommended that consideration is given to a policy requirement for the scheme should be designed with a view to securing a defensible Green Belt boundary.

9.12.3. With regards to wider 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 Section 6 concludes a **moderate or uncertain negative effect** for Scenario 2 and this conclusion also applies in respect of the Local Plan as a whole. LNOS comprises higher quality agricultural land in the regional and national context.

9.13.2. With regards to the other 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 Section 6 concludes a **moderate or uncertain negative effect** for Scenario 2 and this conclusion also applies in respect of the Local Plan as a whole. LNOS has merit in a number of respects, e.g. linking to a city and rail stations, but there are uncertainties at this stage given the extent and costs of required transport upgrades.

9.14.2. With regards to the urban growth strategy, the first point to note is a focus of growth in the city centre, where there is good potential to avoid the need to travel by car, although there is also a focus of growth in Shoeburyness (also recalling a potential Rochford Local Plan allocation here). Overall there is clear merit to an urban focus of growth in a sub-region where traffic is clearly a key issue; however, there are limited opportunities for interventions to encourage modal shift in the urban area, given space constraints and viability challenges. Key to the strategy is considering urban growth options in combination by neighbourhood area, e.g. recognising that higher density growth along a road corridor could support a new active travel route or an improved bus service. In particular, and as discussed in Section 5.4, there is an opportunity to take a coordinated approach to growth along the A13, which is a single lane road through Southend and Castle Point. Southend to Hadleigh is a priority bus corridor and a priority in the LCWIP (see discussion in the IDP) although opportunities are limited due to many areas of shops and on-street parking and many junctions.

9.14.3. With regards to policies, LNOS and Fossetts Farm have already been discussed above, and there has also been discussion of broad support for the neighbourhood focused policies. Policy 10 (Transport and Connectivity), is then a key policy as it specifies transport priorities that must be a focus of investment including via developer contributions. This includes: improving the A127/A1159 strategic corridor including junction/capacity improvements; and providing high-quality transport interchanges in the city centre and at Leigh Railway Station, Shoeburyness Railway Station, Southend University Hospital and London Southend Airport.

9.15. Water

9.15.1. The appraisal in Section 6 concludes a **neutral effect** for Scenario 2 and this conclusion also applies in respect of the Local Plan as a whole. A key point is that LNOS is potentially subject to limited constraint in the context of a constrained region.

9.15.2. With regards to policies, the key point to note is the following requirement in line with the Water Cycle Study, which is a more stringent requirement than that previously proposed in 2025: *"All new residential developments should achieve a progressive water efficiency standard of 110 litres per person per day; reducing to 100 litres per person per day by 2030; and 80 litres per person per day by 2035."* This does have cost implications, but the Viability Study states: *"… evidence shows that this does not notably impact on development viability and is therefore not likely to have a key impact in viability terms."*

9.16. Whole plan appraisal conclusion

9.16.1. The appraisal finds that the plan as a whole performs as per Scenario 2, namely that there will be a clear positive effect in terms of accessibility objectives and 'neutral' effects in terms of a number of objectives, but that there is a risk of negative effects in terms of sustainability objectives relating to climate change mitigation, homes, transport and agricultural land.

9.16.2. Beginning with LNOS, the current Southend LNOS proposals are encouraging in terms of what can be delivered on and off-site, including 45% affordable housing, but there are uncertainties ahead of further work on costs / viability, and there should be ongoing scrutiny ahead of plan finalisation to ensure, as far as possible, that issues will be addressed opportunities realised. Specific matters for ongoing consideration include: A) phasing and its implications for infrastructure and viability; B) future proofing accounting for potential LNOS in Rochford and the ongoing possibility of a comprehensive cross-border scheme; C) the affordable housing mix (i.e. the proportion of social housing, again with viability implications; and D) the possibility of requiring a net zero carbon development, albeit this is acknowledged as likely not possible given competing cost priorities and viability parameters.

9.16.3. With regards to wider aspects of the plan, this essentially amounts to: 1) a new community at Fossetts Farm for 1,350 homes (part permitted); 2) a total of 5,450 homes from urban allocations (including permissions for ~3,500 homes) with a primary focus on the city centre; 3) a windfall assumption of 3,000 homes (informed by an Urban Capacity Study); and 4) development management (DM) policies that will be used to judge planning applications.

9.16.4. With regards to the proposed housing supply from the urban area, the first point to note is that there are inherent uncertainties regarding a number of sites, in terms of: A) delivery (in particular four sites for a total of around 500 homes that are not allocations but 'opportunity sites'); B) site capacity and use mix; and C) the timing of when sites will come forward within the plan period. Secondly, the overall housing mix across many of these sites will be weighted towards flats in a way that does not align with the established need for family homes within Southend. Thirdly, the great majority of urban allocations are developed / previously developed such that there are inherent viability challenges, and a significant proportion of growth is proposed to come forward in parts of the urban area where viability is particularly challenging, most notably the city centre.

9.16.5. These points serve to highlight the importance of LNOS. Also, these points serve to highlight the importance of carefully considering the DM policy requirements that are placed on challenging urban sites, in terms of: A) striking a balance between competing policy priorities within viability parameters; B) ensuring that the cumulative burden of DM policy requirements does not risk impacting site deliverability; and C) ensuring that DM policies do not lead to false comfort, including regarding affordable housing and funding for infrastructure from CIL and S106. Compromises can and often are made at the planning application stage in light of viability evidence, and there is also the context of the new NPPF (2026) in terms of 'national DM policies' and a 'default yes' in urban areas.

9.16.6. It follows that the Viability Study (2026) is a key source of evidence, and a key conclusion is that whilst schemes involving housing are broadly viable (including assuming 30% affordable housing): *"The viability position for flatted development within [the lower viability area, where most new homes are set to be delivered], most specific within and surrounding the city centre, is more challenging. Weaker results are generally associated with smaller schemes, higher-density developments exceeding six storeys and mixed-use schemes incorporating significant commercial floorspace… Build to Rent (BtR) development generally performs more strongly than equivalent for-sale apartment schemes, which may provide an alternative form of apartment development within the city centre."*

9.16.7. A number of recommendations are made that might be considered as part of plan finalisation post submission (i.e. as part of the examination in public), but it is acknowledged that actioning recommendations to improve the performance of the plan in terms of one sustainability objective can have a bearing on the potential to deliver on other objectives.

Cumulative effects

9.16.8. Cumulative effects are a key consideration in South East Essex, and this is particularly the case at the current time given the suite of emerging Local Plans. Housing needs and shared road corridors are primary considerations, along with planning for secondary school capacity, strategic healthcare and the Essex Estuaries and Marshes. There must be a coordinated approach across administrative boundaries as far as possible.

Part 3: Next steps

10. Plan finalisation

10.1.1. Following the receipt of representations on the Proposed Submission Local Plan the aim is to submit the plan for examination in public alongside a summary of the issues raised. The Council will need to remain confident that the plan as previously published is sound and so ready for submission, and there will not be the potential to make amendments to the plan (although suggested amendments might be submitted alongside the plan).

10.1.2. This SA Report will also be submitted alongside the Local Plan.

10.1.3. Following submission the Local Plan will be subject to an Examination in Public overseen by one or more Planning Inspectors, and there will invariably be a consultation on proposed Main Modifications in order to address matters of plan soundness.

10.1.4. Once found to be sound following examination the Local Plan will be adopted, at which time an SA 'Statement' will present prescribed information including "measures decided concerning monitoring".

11. Monitoring

11.1.1. The requirement here is to present "measures envisaged concerning monitoring".

11.1.2. LNOS clearly warrants being a focus of close monitoring, including with a view to flagging any delivery issues that might trigger a need to revisit strategy.

11.1.3. Elsewhere, a focus might be on monitoring the delivery of a selection of key proposed urban allocations, with a view to flagging both: A) sites that are not coming forward in accordance with the anticipated trajectory (i.e. sites are delayed or are not delivering to the anticipated capacity); and B) sites that are coming forward with compromises made in terms of policy objectives. Specific considerations for future monitoring might include:

- Accessibility – are sites delivering community infrastructure or contributions as anticipated?
- Biodiversity – are sites delivering 10% BNG and the required level of urban greening?
- Climate change adaptation – is flood risk affecting the delivery of any allocations and what steps are being taken to avoid and mitigate risk accounting for climate change?
- Climate change mitigation – are any sites delivering as net zero developments?
- Economy & employment – are key sites delivering or progressing towards delivery as anticipated? In general, employment land needs warrant regular monitoring as this will be an important consideration for a future local plan review. There is a clear case for work to explore employment land needs/opportunities at a larger-than-local scale.
- Historic environment – are sites able to avoid and mitigate impacts to key assets in the manner envisaged by site-specific policies? What effect are HIA having?
- Homes – are sites delivering the full policy quota of affordable housing?
- Transport – are sites able to deliver the transport upgrades envisaged by policies and as set out in the Infrastructure Delivery Plan?
- Water – is site delivery being impacted by uncertainties in respect of water supply / resources or capacity at wastewater treatment works?

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. Table C then presents a discussion of more precisely how the information in this report reflects the requirements for the SA Report.

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

	Questions answered		As per regulations… the SA Report must include…
Introduction	What's the plan seeking to achieve?		• 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'?	• 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'?	• 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?	• 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?		• 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?		• 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?		• A description of the monitoring measures envisaged

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

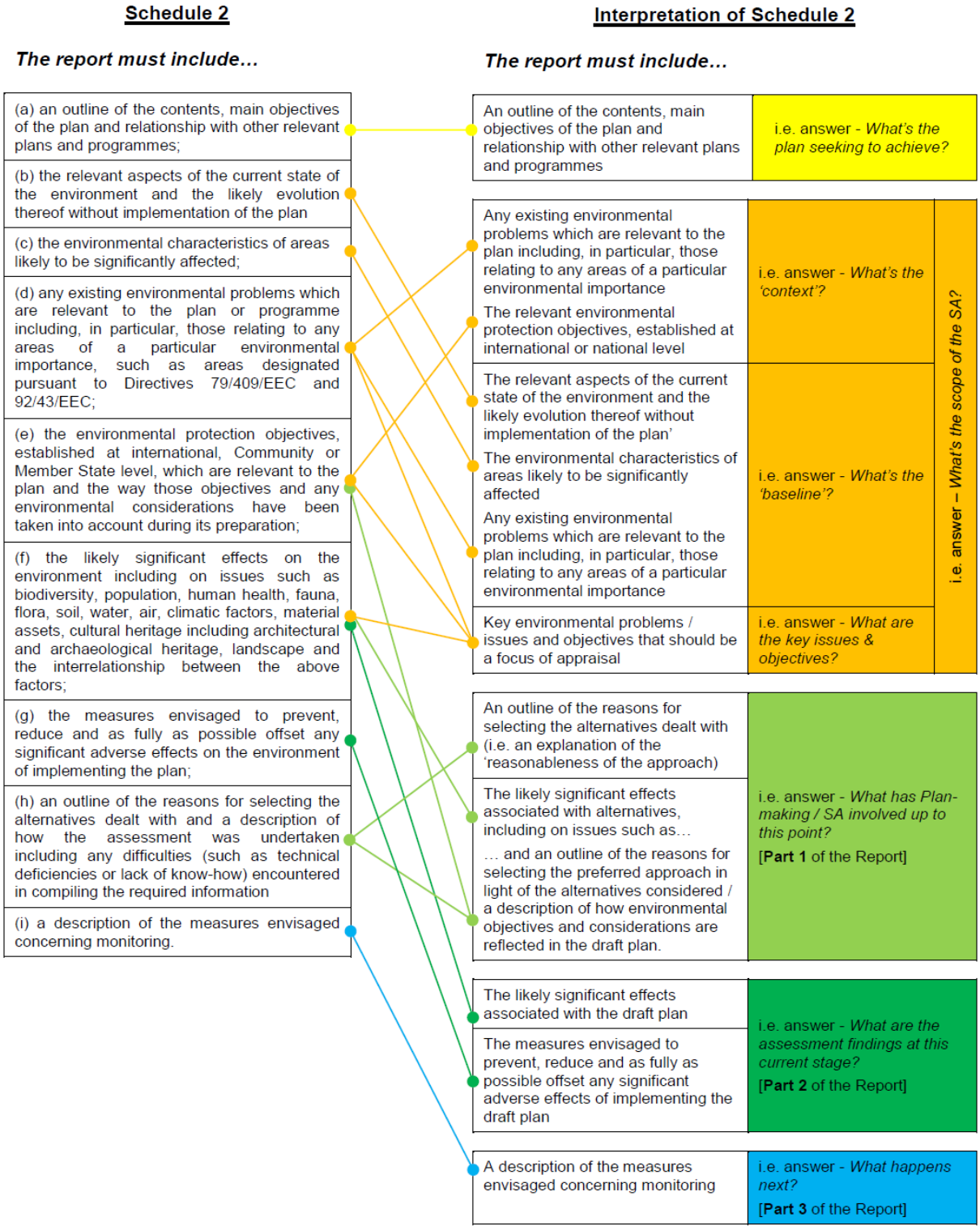


Table C: 'Checklist' of how and where (within this report) regulatory requirements are reflected.

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. The SA scope – in terms of key sustainability issues and objectives, including accounting for evolution of the baseline without the plan – is then discussed throughout the report as appropriate, i.e. in light of the scope of the plan/alternatives.
c) The environmental characteristics of areas likely to be significantly affected;	
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 throughout this report. With regards to explaining *"how… considerations have been taken into account"*, 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. Sections 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 at the start of the report.
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 SA Report is published alongside the Proposed Submission Local Plan in order to inform representations and then subsequent plan-making stages. Specifically, the next stage is expected to be examination in public.
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 SA Report will be taken into account when finalising the plan as part of the examination in public. It should also be noted that an Interim SA Report was published as part of a Regulation 18 consultation held in 2025.