DAC Planning

Southend-on-Sea City Council

Land North of Southend (Bournes Green) Topic Paper

Southend Local Plan

Version 1

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This report takes into account the particular instructions and requirements of our client.
It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

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1.0 Introduction and Purpose

1.1 Purpose

1.1.1 Southend-on-Sea City Council has prepared a new Local Plan to provide a framework for managing growth and development across the City up to 2045. The Local Plan seeks to address Southend's future housing, employment, infrastructure and environmental needs within a highly constrained urban authority characterised by limited land availability, extensive existing development and a tightly drawn administrative boundary.

1.1.2 This Topic Paper has been prepared to support the allocation of Land North of Southend (LNOS), also known as 'Bournes Green' within the emerging Local Plan. Its primary purpose is to explain the Council's approach to the allocation, set out the evidence and policy context that has informed its identification, and provide a clear justification for the release of Green Belt land through the Local Plan process. The paper seeks to demonstrate how the proposed allocation responds to identified development needs and contributes to the wider spatial strategy for the City.

1.1.3 The Topic Paper sets out the exceptional circumstances for Green Belt boundary alterations and the release of LNOS in accordance with national planning policy. It explains how the Council has concluded that exceptional circumstances exist and summarises the evidence to support Green Belt boundary alterations. The Paper also explains how the Local Plan will adhere to the 'Golden Rules' by requiring the provision of a sustainable neighbourhood supported by new infrastructure, green spaces and 45% affordable housing provision, having regard to the Viability Study for the Local Plan.

1.1.4 At the time of writing the position regarding the emerging Rochford Local Plan and the approach to LNOS remains unclear. On 30 September 2026 the Planning Minister Matthew Pennycook issued a holding direction under section 21A of the Planning and Compulsory Purchase Act 2004 following Rochford District Council's decision to remove land within Rochford District proposed to be allocated as an extension to LNOS from the emerging Rochford Local Plan. The holding direction stops Rochford District Council from taking any further steps on the plan while the government considers permanent intervention under section 21 or section 27.

1.2 Relationship with the Wider Evidence Base

1.2.1 This Topic Paper does not seek to duplicate information contained within the wider Local Plan evidence base. Instead, it draws together and summarises key strands of evidence that are relevant to the allocation and demonstrates how they support the Council's approach. It should therefore be read alongside the Local Plan and supporting evidence documents. In particular, the paper should be read in conjunction with the following documents:

1.2.2 **Housing Supply Topic Paper** - The Housing Supply Topic Paper explains the City's housing requirement, housing land availability, urban capacity and anticipated housing supply over the plan period. It demonstrates that Southend faces significant development pressures, has limited urban capacity, and is unable to meet its identified local housing need in full within the existing urban area. It also identifies that a significant proportion of future housing capacity is dependent upon sites currently within the Green Belt.

1.2.3 **Sustainability Appraisals** - The Sustainability Appraisals sets out the evolution of the Local Plan strategy through successive stages of plan preparation and consultation. It describes the various growth options considered by the Council, including urban intensification, urban edge expansion and strategic-scale development north of Southend. It demonstrates that the potential for development north of Southend has been consistently considered throughout the plan-making process and has emerged as one of the very few options capable of accommodating growth at a strategic scale. It also explains the relationship between the allocation and the wider strategic planning context, including cross-boundary considerations involving Rochford District.

1.2.4 **Employment Supply Topic Paper** - The Employment Supply Topic Paper provides evidence regarding Southend's future economic development requirements and the need to accommodate employment growth over the plan period. It identifies economic needs of between 58,600 to 68,300 sq.m of employment floorspace, although notes the significant constraints on land availability within the City. The paper notes that the Local Plan seeks to provide for 68,400 sqm of employment floorspace over the plan period, meeting economic needs. The paper also recognises the contribution that the strategic allocation at Land North of Southend can make towards delivering employment space alongside new housing and supporting infrastructure.

1.2.5 **Consultation Report** – The Regulation 18 Consultation Report documents engagement between Southend City Council, Castle Point Borough Council, Rochford District Council, Essex County Council and other relevant organisations. Effective cross-boundary cooperation has been an important component of plan preparation.

2.0 National Policy Context

2.1 Introduction

2.1.1 The allocation of Land North of Southend (LNOS) has been considered and assessed against the requirements of the National Planning Policy Framework (NPPF) (December 2024). The allocation forms a key component of the Local Plan strategy for meeting Southend's identified housing and employment needs, delivering strategic infrastructure, and accommodating sustainable growth within a highly constrained authority area. The relevance of national policy is therefore not confined to Green Belt considerations, but extends to the wider requirements for sustainable development, housing delivery, infrastructure provision and long-term plan making.

2.1.2 The following section sets out the key relevant national planning policy considerations for LNOS in the context of the NPPF 2024 (as the Local Plan will be examined under the transitional arrangements provided for by the NPPF 2026). However, future development management decisions will be taken on the basis of the NPPF 2026.

2.2 Plan-Making and Strategic Planning

2.2.1 The NPPF requires local plans to be positively prepared, justified, effective and consistent with national policy. LNOS represents a strategic allocation intended to contribute towards meeting Southend's development requirements where evidence demonstrates that opportunities within the existing urban area are insufficient to accommodate development needs in full.

2.2.2 The NPPF requires strategic policies to make sufficient provision for housing, employment, infrastructure, community facilities and environmental enhancement, whilst addressing cross-boundary matters through effective cooperation. Given the location of LNOS adjacent to the Rochford boundary, the allocation has particular relevance to these requirements and has been considered alongside infrastructure planning and ongoing engagement with neighbouring authorities and infrastructure providers.

2.3 Housing Delivery

2.3.1 A central objective of the NPPF is to significantly boost the supply of homes and ensure local plans identify sufficient deliverable and developable land to meet

identified housing needs. The Framework recognises that larger scale urban extensions can play an important role in meeting development requirements where land supply is constrained and where sustainable growth cannot be accommodated within existing settlements alone.

2.3.2 For Southend, the evidence indicates that there are limited opportunities to meet development needs solely through brownfield redevelopment, intensification and smaller urban sites. Within this context, LNOS represents the primary opportunity capable of delivering development at a strategic scale and making a meaningful contribution towards housing requirements over the plan period.

2.4 Economic Growth and Infrastructure

2.4.1 The NPPF places significant weight on supporting sustainable economic growth and requires plans to identify strategic sites capable of supporting investment, employment growth and infrastructure delivery. The mixed-use nature of LNOS reflects this objective by providing opportunities not only for housing delivery but also for employment development, supporting infrastructure and investment that will contribute to Southend's long-term economic resilience.

2.4.2 National policy also requires strategic allocations to be supported by infrastructure planning, including transport, education, health, utilities and green infrastructure. The scale of LNOS provides the opportunity to secure coordinated infrastructure delivery alongside development, consistent with the NPPF's expectation that growth and infrastructure should be planned together.

2.5 Sustainable Development and Transport

2.5.1 The NPPF requires significant development to be directed towards locations that are, or can be made, sustainable, with opportunities for walking, cycling and public transport. National policy specifically recognises the role of urban extensions and larger scale developments where they are well connected to existing settlements, services, employment opportunities and infrastructure.

2.5.2 The location of LNOS adjoining the existing urban area provides opportunities to integrate development with Southend's established communities, employment areas and transport networks, whilst enabling improvements to sustainable transport infrastructure and active travel connections. This is an important consideration in the assessment of potential development options, particularly in the context of Green Belt boundary review where the NPPF requires sustainable patterns of development to be considered.

2.6 Making Effective Use of Land

2.6.1 National policy requires authorities to maximise the use of suitable brownfield and underutilised land and optimise development densities before considering Green Belt release. However, the NPPF recognises that land constraints may limit the extent to which identified needs can be accommodated within the urban area alone.

2.6.2 The Council's plan-making process has therefore considered the capacity of urban land alongside opportunities for intensification and brownfield redevelopment. The identification of LNOS reflects the conclusion that additional development land is required to support the Local Plan strategy and meet identified development needs.

2.7 Green Belt Policy

2.7.1 Green Belt policy is a key consideration for LNOS. The NPPF confirms that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or review of a Local Plan. The Framework states that exceptional circumstances may arise where authorities are unable to meet identified housing, employment or other development needs through alternative means.

2.7.2 The allocation of LNOS reflects a range of objectives within the NPPF, including the requirement to aim to meet housing and employment needs, identify sufficient development land, support sustainable patterns of growth, coordinate infrastructure delivery and review Green Belt boundaries where development needs cannot otherwise be accommodated. The allocation should therefore be viewed not solely as a Green Belt matter, but as a strategic response to the wider requirements of national planning policy and the particular land constraints affecting Southend-on-Sea.

2.8 Habitats Regulations Assessment and SANG

2.8.1 The Southend coastline has national and international importance for wintering birds. Southend on Sea City Council and neighbouring authorities have worked jointly to prepare and implement a strategic mitigation scheme to lessen the impact of local housing development on protected birds along the Essex coast.

2.8.2 The Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) (2026) sets a tariff which applies to net new residential development within the Essex Coast Zone of Influence (ZoI). The whole of Southend-on-Sea

lies within the ZoI and therefore residential development within the City will be required to contribute towards the RAMS mitigation package to address recreational impacts on internationally designated Habitat Sites and ensure compliance with the Habitats Regulations. Where a development proposal is deemed likely to result in recreational impacts on internationally designated sites in its own right, additional mitigation measures will be required. Depending on the scale and location of the proposal, this may include the provision of substantial on-site or off-site accessible natural greenspace. having regard to Natural England's Suitable Alternative Natural Greenspace (SANG) principles. SANG is outside the remit of the RAMS Strategy and a separate guidance note will be prepared by the Essex Coast authorities on their approach to SANG within the strategy area.

3.0 Overview of Land North of Southend

3.1.1 The preparation of the Local Plan has been undertaken against the backdrop of a significantly increased housing figure generated through the Government's Standard Method for assessing local housing need. The Standard Method establishes the minimum number of homes that local planning authorities are expected to plan for and is intended to ensure that sufficient land is identified to meet future housing needs and support economic growth.

3.1.2 Application of the Standard Method has resulted in a housing need figure which substantially exceeds the level of housing delivery achieved historically within Southend and presents a significant challenge given the City's tightly constrained administrative area, extensive existing urbanisation and limited supply of unconstrained development land.

3.1.3 In responding to this level of need, the Council has sought to maximise opportunities for development within the existing urban area through a combination of brownfield redevelopment, regeneration opportunities, urban intensification and the efficient use of previously developed land. These measures form an important component of the Local Plan strategy and are consistent with national planning policy objectives relating to the effective use of land. However, evidence prepared to support the Local Plan demonstrates that urban opportunities alone are insufficient to accommodate local housing need required over the plan period.

3.1.4 As a result, the Council has been required to consider additional strategic development options capable of delivering housing at a scale that can make a meaningful contribution towards meeting identified needs. This assessment has included consideration of potential urban extensions and the role of land currently designated as Green Belt. Land North of Southend (LNOS) comprises a collection of sites submitted to the Council through the Call for Sites. Through the preparation of the Local Plan, LNOS has been identified as a strategic growth location with the potential to make a significant contribution towards meeting the City's development needs over the plan period and beyond. The site has been considered as part of the Council's wider assessment of development

opportunities and spatial options, undertaken in the context of Southend's limited land supply, tightly constrained urban boundaries and the need to accommodate housing, employment and infrastructure requirements in a sustainable manner.

3.1.5 The figure below outlines the location of LNOS.

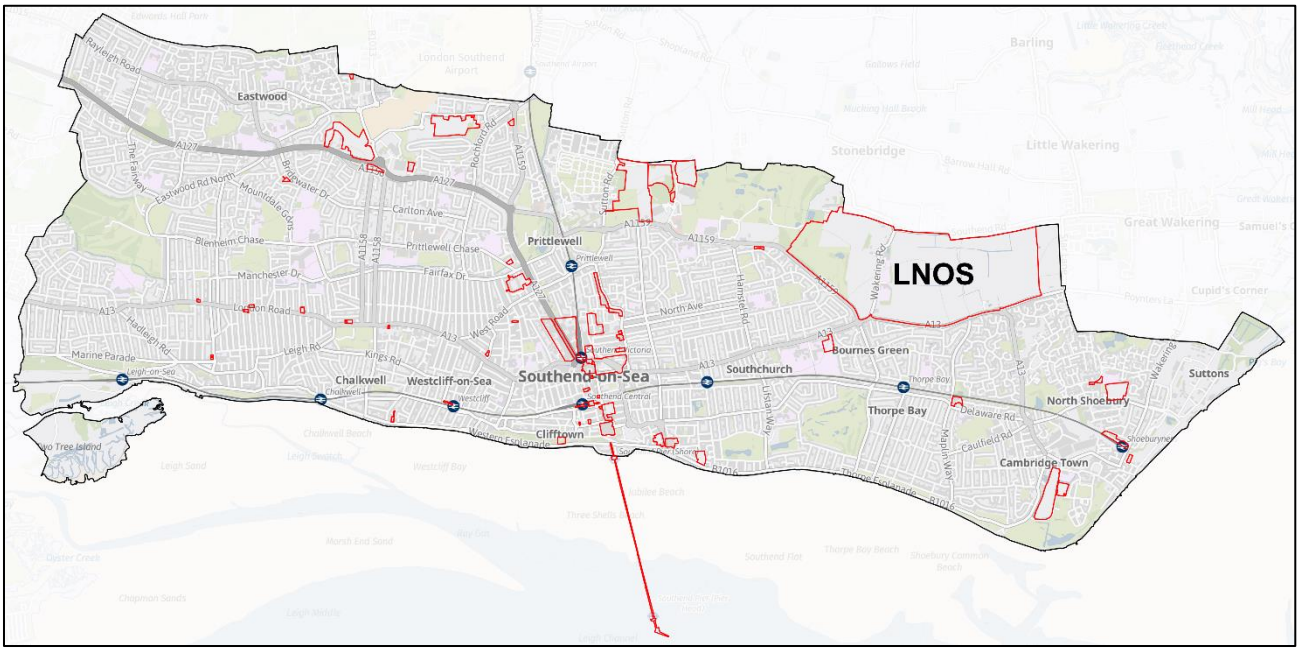


Figure 3.1 – Location of Land North of Southend

3.1.6 The allocation relates to land located within the Southend-on-Sea administrative area immediately north of the existing urban edge. Whilst a wider development opportunity, including land extending into Rochford District, is being promoted to the Rochford Local Plan. The allocation proposed through the Southend Local Plan relates solely to the land within the City's administrative boundary. Nevertheless, the Council recognises the strategic importance of the wider area and has continued to engage with Rochford District Council, Essex County Council and other relevant stakeholders regarding the long term planning of this broader cross-boundary location.

3.1.7 Through successive iterations of the Housing and Economic Land Availability Assessment (HELAA), Urban Capacity study, Strategic Growth Locations Assessment and Sustainability Appraisal, Land North of Southend consistently emerged as one of the very few locations capable of accommodating development at a scale sufficient to make a meaningful contribution towards identified housing and employment needs whilst supporting the delivery of strategic infrastructure.

4.0 Exceptional Circumstances for Green Belt Release

4.1 Overview

4.1.1 Paragraphs 145 - 147 of the NPPF (2024) outline the exceptional circumstances in which local planning authorities may seek to alter Green Belt boundaries through local plans, and this may include circumstances where it is necessary as a means to seek to meet the identified local housing need.

4.1.2 The following section outlines the exceptional circumstances at a plan-wide level for altering Green Belt boundaries and site-specific justification for releasing LNOS from the Green Belt through the Local Plan.

4.2 Plan Level Exceptional Circumstances

4.2.1 Before releasing Green Belt land, authorities must demonstrate that they have fully examined reasonable alternatives, including maximising brownfield development, optimising densities and engaging with neighbouring authorities regarding the potential redistribution of development (paragraph 147).

4.2.2 Those three steps are the tests in NPPF paragraph 147(a) to (c). They are discharged as follows: (a) brownfield and under-used land – see section below and the Housing Supply Topic Paper; (b) density optimisation – Local Plan policies SP5, DM7.2 and DM7.3, and the Urban Capacity study; (c) neighbouring authorities - section 2 and the Regulation 18 Consultation Report.

4.2.3 Only once those steps are evidenced does paragraph 146 require a review of Green Belt boundaries to meet identified 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 this Plan.

4.2.4 The Green Belt Assessment and wider Local Plan evidence base have been prepared to consider whether Southend's development needs can be met without Green Belt release and whether the proposed amendments to Green Belt boundaries associated with LNOS would fundamentally undermine the role and function of the remaining Green Belt in the plan area. These considerations form a central part of the justification for the allocation.

4.2.5 NPPF paragraph 148 requires plans, where Green Belt release is necessary, to give first priority to previously developed land, then grey belt which is not previously developed, and then other Green Belt locations, provided the location is appropriate having regard to sustainable patterns of development (paragraphs 110 and 115). The Green Belt Assessment and the Sustainability Appraisal classify the great majority of site BG001 (LNOS) as Green Belt that is not grey belt. Release of that land is proposed only because the first two categories (previously developed land and grey belt) do not yield a sufficient supply, and because the site is a sustainable urban extension adjoining the existing urban edge. Accordingly, NPPF paragraphs 67 to 68 and 156 to 157 (the Golden Rules) apply.

4.2.6 Paragraph 67 requires at least 50% of the housing to be affordable unless that would make the development of these sites unviable when tested in accordance with the PPG. The Viability Study tests LNOS and indicates the viability position having regard to different levels of financial contributions towards infrastructure and affordable housing contributions. This has informed the affordable housing requirement incorporated into policy DM2b. Further details are set out in section 7 below.

4.2.7 The Council considers that the justification for Green Belt release is strategic in nature and therefore forms part of the overall spatial strategy for the Local Plan. The exceptional circumstances case is not solely related to any individual allocation but arises from the combination of identified housing, affordable housing, employment and infrastructure needs, together with the limited capacity of the urban area to accommodate those needs in full. The Local Plan establishes the strategic need for Green Belt release through the spatial strategy, whilst the allocation policies identify the specific sites to be released and the detailed Green Belt boundaries to be amended.

Housing Needs

4.2.8 The Council's Housing Supply evidence demonstrates the scale of the challenge facing Southend in seeking to meet its identified development needs. The Integrated Needs Assessment identifies a Local Housing Need of 1,405 dwellings per annum, equivalent to 28,100 homes over the 2025-2045 plan period. However, Southend is one of the most densely populated local authority areas outside London and is characterised by a tightly drawn administrative boundary, extensive existing development and limited land availability. The Housing Supply Topic

Paper notes that these factors create significant practical constraints on the City's ability to accommodate future growth solely within the existing urban area.

4.2.9 In preparing the Local Plan, the Council has undertaken a comprehensive programme of evidence gathering to identify all reasonable opportunities for development within the urban area. This has included successive Housing and Economic Land Availability Assessments (HELAA), an Urban Capacity study, a review of the Brownfield Land Register, assessment of employment land release opportunities and consideration of windfall development potential. The purpose of this work was to establish the maximum reasonable housing capacity that could be delivered whilst making effective use of urban land and ensuring that no realistic source of supply was excluded from assessment.

4.2.10 The results of this exercise demonstrate that even after applying ambitious assumptions regarding urban intensification, brownfield redevelopment and windfall delivery, the total housing capacity identified within Southend amounts to a total supply of 9,824 dwellings. This is only sufficient to meet just over one third of the City's assessed housing need over the plan period, leaving an unmet need of approximately 18,276 homes. With alterations to Green Belt boundaries and the addition of LNOS the supply can be increased to 14,724 dwellings within the plan period. This would provide for around half of local housing needs. It is therefore evident that a significant proportion of the identified housing capacity in the Local Plan is dependent upon the release of Green Belt land.

4.2.11 Of the 14,724 homes identified within the housing trajectory, 4,900 dwellings would be delivered on Green Belt release sites at LNOS, with a total capacity for sites on Green Belt within the Local Plan at approximately 5,850 homes when including Green Belt land at Fossetts Farm (HEA264).

4.2.12 The Housing Supply Topic Paper concludes that the Council has adopted a proportionate and thorough approach to identifying housing land and that no compelling evidence exists to support materially higher levels of urban capacity beyond those already identified. Consequently, the evidence demonstrates that Southend's development needs cannot be met through brownfield land, urban intensification, windfall development and previously developed land alone.

4.2.13 The allocation of LNOS would make a substantial contribution towards meeting identified housing needs by providing a strategic supply of affordable housing and family homes in a location capable of accommodating comprehensive residential growth. Southend faces acute affordability pressures, with house prices exceeding

ten times workplace earnings and an identified need for affordable homes. The Housing Needs Assessment also identifies a continued requirement for family-sized accommodation to address overcrowding and meet the needs of households currently on the housing register. Unlike many brownfield opportunities within the urban area, LNOS has the capacity to deliver a broad range of housing types and tenures, including affordable rent, affordable home ownership and larger family dwellings, facilitating the creation of a genuinely mixed and balanced community. As such, the site would play an important role in helping to contribute substantially towards meeting the city's housing needs, improve housing choice and affordability, and supporting the Council's wider social and economic objectives.

Employment Needs

4.2.14 The case for Green Belt release is reinforced by the City's economic development needs. Evidence prepared for the Local Plan identifies a requirement for between 58,600 to 68,300 sq.m of additional employment floorspace to support forecast economic growth and provide sufficient employment opportunities alongside planned housing delivery. The Employment Supply Topic Paper highlights the significant constraints on land availability within Southend and the need to ensure that the limited land resource available is used efficiently to accommodate both housing and employment growth.

4.2.15 Whilst opportunities have been identified through the intensification of existing employment areas, redevelopment of brownfield land and strategic employment allocations, the evidence demonstrates that the higher employment requirement opportunity of 68,300 sq.m relies upon a range of sites across the City, including major mixed-use strategic allocations. These include the LNOS allocation, which is identified as having capacity to deliver approximately 12,500 sq.m of employment floorspace alongside new homes and supporting infrastructure. This represents one of the largest individual contributions to future employment land supply identified within the Local Plan evidence base.

4.2.16 The strategic allocation at LNOS therefore contributes not only towards meeting housing needs, but also towards achieving the Council's wider economic objectives by supporting employment growth, business investment and job creation. Without strategic growth opportunities of this nature, the City's ability to accommodate both its housing and economic development requirements would be substantially constrained.

Infrastructure Needs

4.2.17 The IDP indicates that LNOS has the potential to support the delivery of a range of infrastructure that would not be achievable through smaller dispersed development opportunities. Requirements identified through the IDP include a new primary healthcare hub, new primary and secondary education provision, early years facilities, strategic transport and active travel improvements, community facilities, public open space, green infrastructure, sport and recreation provision and utility upgrades.

4.2.18 The scale of LNOS provides the critical mass necessary to support new facilities and services on-site, reducing pressure on existing infrastructure and helping to create a sustainable and self-supporting neighbourhood.

4.3 Site-Specific Exceptional Circumstances for LNOS

4.3.1 The identification of LNOS has not arisen solely from consideration of Green Belt land. Rather, it is the outcome of a long-standing process of plan preparation, site promotion, evidence gathering and assessment of alternative growth options. Since the commencement of Local Plan preparation, the Council has examined a range of approaches including urban intensification, regeneration-led growth, urban edge expansion and strategic-scale development opportunities.

4.3.2 Early Housing and Employment Land Availability Assessments demonstrated that identified development needs could not be accommodated within the existing urban area alone. The Council therefore considered whether strategic-scale development opportunities existed that could make a substantial contribution towards housing and employment needs whilst also facilitating the delivery of supporting infrastructure and sustainable communities.

4.3.3 The South East Essex Strategic Growth Locations Assessment (2019) identified the area north of Southend as the principal location with the potential to accommodate strategic-scale development, subject to further consideration of Green Belt, infrastructure and environmental constraints. Alternative broad locations were assessed adjacent to the urban area of Southend, but were found to be significantly more constrained or incapable of accommodating development at the scale required.

4.3.4 Subsequent stages of plan preparation continued to test alternative approaches. The evidence base, including the Housing Supply Topic Paper, Urban Capacity study, HELAA assessments and Sustainability Appraisal, consistently

demonstrated that reliance on urban capacity and regeneration opportunities alone would be insufficient to address identified housing and employment needs. Strategic-scale development beyond the existing urban area therefore remained necessary if the Local Plan was to maximise development delivery.

4.3.5 Land North of Southend represents one of the very few opportunities capable of accommodating development at a strategic scale and therefore performs a critical role within the spatial strategy of the Local Plan.

4.3.6 The Council acknowledges that the allocation will result in harm to Green Belt purposes, particularly through the loss of openness and encroachment into countryside. However, the Council has concluded that harm is outweighed by the scale of identified need and wider benefits delivered through the Local Plan strategy.

Green Belt Purposes

4.3.7 The Council has considered the contribution that the affected land makes to Green Belt purposes and the extent to which release would affect the integrity and function of the remaining Green Belt.

4.3.8 The Council commissioned a comprehensive Green Belt Assessment to evaluate the contribution made by Green Belt land within Southend-on-Sea to the purposes of the Green Belt and to consider whether the release of land would fundamentally undermine the function of the remaining Green Belt. The assessment was undertaken in accordance with national Green Belt policy and associated Planning Practice Guidance.

4.3.9 The assessment confirms that much of the Green Belt land north of Southend, including the majority of land comprising the LNOS allocation, makes a strong contribution to Green Belt Purpose A (checking unrestricted sprawl) and Purpose C (safeguarding the countryside from encroachment). The assessment also finds, however, that the area generally makes only a weak contribution to Purpose B (preventing neighbouring towns merging into one another) and Purpose D (preserving the setting and special character of historic towns). In particular, the principal site areas assessed are identified as making strong contributions to Purposes A and C but weak or no contribution to Purposes B and D.

4.3.10 The significance of these findings is that they demonstrate the nature of the Green Belt function being affected. The release of LNOS would involve harm to Green Belt purposes, particularly through the extension of Southend's urban area

northwards. However, the assessment concludes that the strategic role of the wider South Essex Green Belt would remain intact. The Green Belt Assessment (paragraphs 4.17 - 4.19) concludes that, although the potential development sites cumulatively form a substantial proportion of Southend's Green Belt, their development would not fundamentally undermine the remaining Green Belt across the area of the Plan (the analysis paragraph 146 NPPF requires). Remaining Green Belt to the west of Southend (parcels SO1–10) and to the east (SO22) is physically and functionally separated from the proposed releases.

4.3.11 When considering the local plan area in isolation, sites CA001, CA002, HE143, HE145 and CA003 all extend up to the local authority boundary, meaning that the release of these sites individually would mean that Southend would increasingly cease to have its own Green Belt buffer. However, it is already the case that most of the urban edge of Southend lacks a buffer of Green Belt land lying within the SCC area, with land in Rochford and Castle Point playing a more substantial role in maintaining a buffer around the city and, in particular, in preventing merger with other towns.

4.3.12 This limited role of Green Belt land in the Southend plan area means that, although the potential development sites cumulatively form a substantial proportion of Southend's Green Belt, their development would not fundamentally undermine the remaining Green Belt across the area of the plan. The Green Belt land to the west of Southend, including parcels SO1 – 10, and SO22 to the east of Southend, is physically and functionally separated from the potential development sites. Therefore, development or release of the sites would not impact this remaining Green Belt from serving the Green Belt purposes in a meaningful way.

4.3.13 Moreover, a substantial area of Green Belt in the southern part of Rochford would continue to serve the Green Belt purposes in relation to development in both Rochford and Southend. It should be noted, however, that development of Green Belt land in Rochford would have potential to affect the role of Green Belt in the SCC plan area, either in isolation or in combination with the development of Green Belt land in Southend.

4.3.14 As the wider Local Plan evidence base demonstrates that Southend faces significant housing and employment growth pressures, has limited brownfield and urban capacity, and has no other strategic-scale opportunities to deliver development, LNOS emerges as one of the very few locations capable of making

a substantial and meaningful contribution towards meeting identified needs in a sustainable manner.

4.3.15 Development of LNOS is likely to impact the future contribution of the Green Belt land within CA001, but not to the extent that it would cease to perform a meaningful contribution to the Green Belt purposes as a whole. The Council does not consider that site-specific exceptional circumstances exist to justify the removal of parcel CA001 from the Green Belt for the reasons further explored below.

Agricultural Land

4.3.16 The Council recognises that the allocation of LNOS will result in the loss of a substantial proportion of the agricultural land currently remaining within the Southend-on-Sea administrative area. This is acknowledged as a significant adverse effect of the allocation and has been taken into account as part of the overall planning judgement regarding the release of Green Belt land and the selection of sites for allocation.

4.3.17 In accordance with national policy, the Council has considered the quality and function of the agricultural land affected together with the wider objectives of the Local Plan. The NPPF requires planning authorities to take account of agricultural land quality and, where significant development of agricultural land is necessary, seek to use poorer quality land where possible. The Council has had regard to these requirements throughout the site selection process, Sustainability Appraisal and Green Belt review (insofar as they relate to key planning policy, practice guidance and case law for Green Belts).

4.3.18 In determining that exceptional circumstances exist, the Council has specifically considered the implications for agricultural land resources. Whilst the allocation would substantially reduce the extent of agricultural land within Southend itself, the City is a highly urbanised authority with a tightly constrained administrative boundary and a very limited remaining land resource. The Council has also considered the wider South East Essex context, recognising that substantial areas of agricultural land would remain available for productive use beyond the allocation area.

4.3.19 The Council recognises that agricultural land is a finite resource and that the loss of productive land represents an adverse effect which cannot be fully mitigated. This harm has therefore been considered within the site selection process and Sustainability Appraisal. However, the Council has also considered the substantial

benefits associated with the allocation, including the contribution towards meeting identified housing needs, the delivery of affordable housing, provision of new education facilities, employment opportunities, supporting infrastructure, enhanced green infrastructure, improved public access and the creation of a sustainable urban extension closely related to the existing built-up area.

4.3.20 Having considered these factors, the Council concludes that there is no reasonable alternative strategy capable of contributing significantly towards identified development needs in a sustainable manner whilst avoiding the loss of agricultural land associated with the allocation. The loss of agricultural land has therefore been weighed alongside the significant social, economic and infrastructure benefits associated with the proposal and forms part of the wider planning balance underpinning the Local Plan.

Compensatory Improvements

4.3.21 The Council recognises that the release of Green Belt land should be accompanied by measures which enhance the quality, accessibility and beneficial use of the remaining Green Belt. National policy expects local planning authorities to plan positively to enhance the beneficial use of Green Belt land, including through improved public access, opportunities for outdoor recreation, landscape enhancement and biodiversity improvements.

4.3.22 The Council has therefore considered compensatory improvements as part of the wider planning balance associated with Green Belt release. Whilst such measures do not in themselves justify Green Belt release, they can assist in ensuring that the remaining Green Belt continues to perform valuable recreational, environmental and landscape functions and provides enhanced benefits to existing and future communities.

4.3.23 Particular opportunities exist to enhance public accessibility to the remaining Green Belt and wider countryside as part of the LNOS allocation. The Council will seek the provision of new and enhanced public parkland, walking and cycling routes, improvements to the public rights of way network and strengthened green infrastructure connections between the development and the wider countryside. In addition, the Local Plan includes a Proposed Protected Greenspace as part of creating a buffer of Green Belt between LNOS and Great Wakering.

4.3.24 Opportunities will also be explored to improve connectivity to nearby areas of Suitable Alternative Natural Greenspace (SANG), where appropriate, and to

create attractive recreational routes that encourage greater use and appreciation of the remaining Green Belt and countryside.

4.3.25 Collectively, these improvements would represent a significant enhancement to the recreational and environmental value of the remaining Green Belt and would assist in meeting the objectives of national policy relating to Green Belt enhancement, public access and the delivery of accessible green space.

Sustainability Appraisal

4.3.26 The Sustainability Appraisal identifies that the allocation of LNOS would: A) reduce the amount of unmet housing need arising from the Plan; B) provide 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) deliver a large proportion of family and affordable homes; D) provide new employment land; and E) be relatively unconstrained in some environmental respects, notably in terms of biodiversity and the historic environment and arguably water.

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

Defining alterations to the Green Belt boundary

4.3.28 The Local Plan includes proposed alterations to the Green Belt boundary to facilitate the allocation and delivery of LNOS. Policy SP2 (Spatial Strategy) incorporates growth at LNOS as a key component of the Spatial Strategy, alongside the regeneration and growth within the existing urban area.

4.3.29 Policy SP2b provides the policy parameters and guiding principles for Bournes Green New Neighbourhood (LNOS). Policy DM2b provides the requirements for the allocation, which is referenced as BG1. This encompasses land parcels CA002, CA003, HEA143 and HEA145 and the small intervening areas between these sites.

4.3.30 The detailed alteration to the Green Belt boundary required to facilitate the allocation of BG1 has been informed by work undertaken by LUC (see 'Revised Green Belt boundary for Bournes Green New Neighbourhood' paper). The map

below outlines the proposed development sites together with three options for Green Belt boundary amendments.

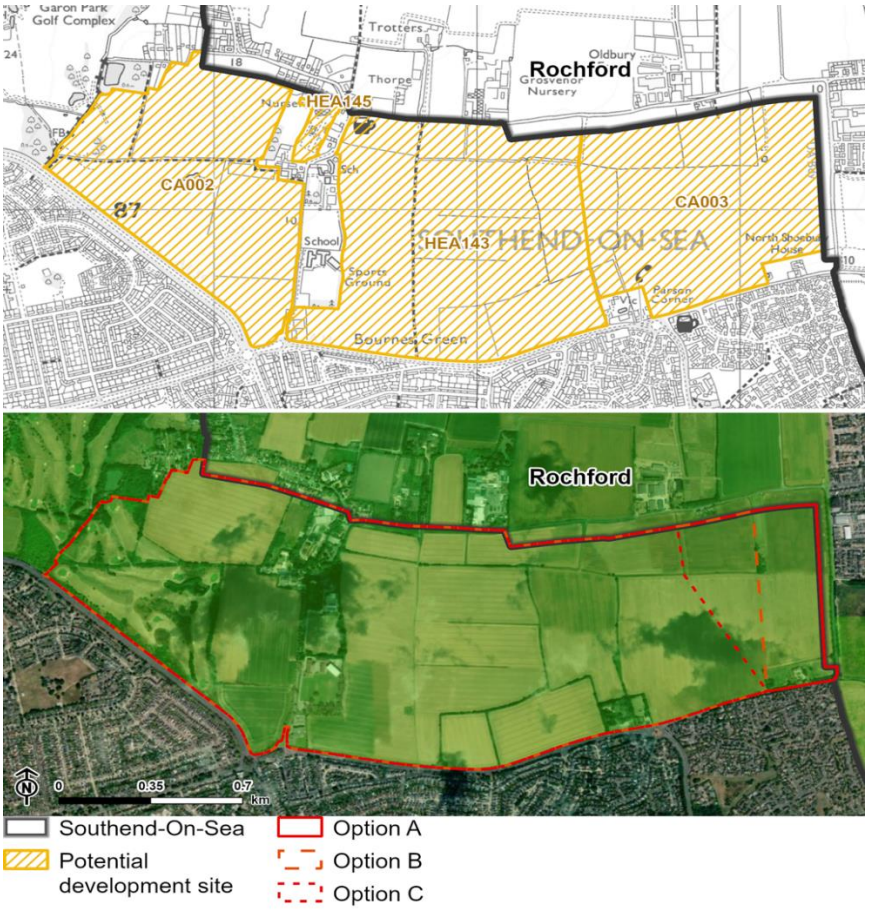


Figure 4.1 – Proposed alterations to the Green Belt Boundary at Land North of Southend

4.3.31 In establishing an appropriate alteration to the Green Belt boundary which reflects the professional independent advice of LUC and has close regard to the NPPF requirement for Green Belt boundaries to be clearly defined using readily recognisable and defensible features, the Local Plan incorporates an eastern boundary to the LNOS allocation which reflects Option B. This is required to ensure that a sufficiently sized gap is retained between the urban edges of Southend and Great Wakering in the future. The Council considers that adopting option A would only leave a narrow gap between Southend and Great Wakering which would cease to make a strong contribution to Purpose A and would inevitably become grey belt. The selection of option C would reduce the effectiveness of the site to deliver the comprehensive development required including a school. The adoption of option B is a planning judgment and therefore provides the most appropriate approach having regard to national planning policy

and the aspirations of the Council to ensure a strong future Green Belt which provides for the Green Belt purposes and maintains separation between Southend and Great Wakering. The Council considers that this approach will not fundamentally undermine Green Belt purposes.

Parcel CA001

4.3.32 There is feasibly the option of delivering additional homes within the Southend part of LNOS by allocating HELAA site CA001. The Regulation 18 representation received from Bellway Homes in 2025 did not promote CA001 for residential, and the anticipated planning application does not cover the western 18 holes of Garon Park golf course (site CA001). 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 500 homes could be delivered on the site subject to re-provision of the golf course.

4.3.33 However, the site has not been included in the Regulation 19 proposed submission local plan for the following reasons: proposals are uncertain at this stage, and it is not clear how any reprovision of the golf course could be delivered, particularly as land would be required beyond the boundary of Southend in Rochford District; the evidence in the Playing Pitch Strategy (2026) identifies a need to retain the golf course (recalling that 9 homes of the current 27 hole golf course are set to be lost through allocation of HELAA site CA002); there is a need to carefully plan for Garon Park as a key city-wide leisure asset; CA001 is constrained including noting that the eastern part is associated with a notable density of woodland, a bridleway and functional floodplain along Mucking Hall Brook; and the Local Plan must only commit to delivery of sites known to be “developable”.

5.0 Effective Cooperation and Cross-Boundary Planning

5.1 Strategic Context

5.1.1 Land North of Southend lies adjacent to the administrative boundary with Rochford District and therefore raises strategic issues relating to housing growth, transport infrastructure, education provision and wider place-making. The Council has engaged on these matters through a programme of ongoing cooperation with Rochford District Council, Essex County Council and other South Essex authorities. This engagement has informed both the evidence base and the development of the Local Plan strategy.

5.2 Joint Evidence Base and Strategic Planning

5.2.1 Some evidence informing consideration of LNOS has been prepared jointly with neighbouring authorities. This includes with Rochford District Council the Landscape Character, Sensitivity and Capacity Study and Settlement Role and Hierarchy Study. The Councils have also engaged through the preparation of other studies, such as Green Belt, Transport Assessment and Infrastructure Delivery Plan.

5.3 Housing Need and Unmet Need

5.3.1 The Council has consistently engaged neighbouring authorities regarding the potential to accommodate any unmet housing need arising from Southend. That engagement has confirmed that neighbouring authorities face similar land supply and Green Belt constraints and are unable to accommodate unmet housing need arising from Southend. The evidence therefore indicates that the Council cannot rely upon neighbouring authorities to meet a proportion of its housing need and must maximise opportunities within its own area.

6.0 Infrastructure Delivery

6.1 Transport Assessment

6.1.1 The Southend-on-Sea Local Plan Regulation 19 Transport Modelling Assessment (2026) produced by Pell Frischmann identifies a package of highway, public transport and active travel interventions associated with LNOS, including improvements to the wider highway network, mobility hubs, enhanced bus infrastructure and new walking and cycling connections linking the site to the existing urban area and surrounding destinations. It is noted that the allocation would result in higher levels of traffic on the existing transport network.

6.1.2 The Assessment demonstrates that the effects of LNOS growth can be mitigated with a complete package of highway, public transport (bus) and active travel schemes. The modelling produced by Pell Frischmann demonstrates that growth in the wider local plan (excluding LNOS) can be mitigated with a number of highways improvements under a “Southend Light” package.

6.1.3 To account for the added growth arising from LNOS, a more complete “Southend Plus” mitigation package has been identified which includes additional highways, public transport and active travel schemes. The modelling forecasts that with these interventions, a 10% reduction in the car mode share could be achieved for the residents of LNOS (10% of trips would shift from driving to public transport or active travel trips). This shift, alongside the additional schemes, would in turn fully mitigate the effects of the growth arising from LNOS.

6.1.4 The estimated costs for the “Southend Light” transport mitigation package (excluding LNOS) total £72m in 2034 prices (£54.4m in 2026 prices). The additional more extensive “Southend Plus” package (fully mitigating the effects of growth of LNOS) has an estimated additional total cost of £128m in 2034 prices (£98 in 2026 prices).

6.1.5 It should be noted that the evidence assumes that “Southend Plus” builds upon “Southend Light” rather than replacing it. All schemes in “Southend Light” are assumed to also exist in the “Southend Plus” package. Therefore, the total respective costs of “Southend Plus” are comprised of the cost estimates for “Southend Light” in additional to the “Southend Plus” estimates quoted above.

6.2 Infrastructure Delivery Plan

6.2.1 The Southend-on-Sea Infrastructure Delivery Plan 2026 (IDP) provides the primary evidence base for assessing the infrastructure implications of the Local Plan and the allocation of LNOS. The IDP has been prepared through extensive engagement with infrastructure providers, statutory agencies, utility companies and service providers and assesses the infrastructure required to support the Local Plan growth strategy to 2045. The IDP identifies infrastructure requirements relating to transport, education, healthcare, community facilities, emergency services, green infrastructure, utilities, flood management and sport and recreation, and considers both existing infrastructure deficits and the additional requirements arising from planned growth.

6.2.2 The evidence demonstrates that investment in infrastructure will be required across Southend to support planned development. In particular, the IDP identifies strategic transport improvements, additional education capacity, expanded healthcare provision, enhanced green infrastructure networks and upgrades to utilities and emergency services as essential components of delivering sustainable growth. The majority of these requirements are expected to be funded through a mixture of developer contributions and other funding. The IDP therefore provides confidence that infrastructure needs have been identified and a framework established for their delivery alongside growth.

6.3 Infrastructure Requirements Associated with Land North of Southend

6.3.1 The LNOS allocation will deliver approximately 4,900 dwellings together with employment space, community facilities, green infrastructure, transport mitigation and supporting services. The IDP identifies that this scale of development will require new infrastructure to be planned and delivered as part of a comprehensive master-planned neighbourhood, rather than relying solely on existing facilities within the urban area.

6.3.2 The IDP indicates that LNOS has the potential to support the delivery of a range of infrastructure that would not be achievable through smaller dispersed development opportunities. Requirements identified through the IDP include a new primary healthcare hub, new primary and secondary education provision, early years facilities, strategic transport and active travel improvements, community facilities, public open space, green infrastructure, sport and recreation provision and utility upgrades.

6.3.3 Importantly, the allocation creates the opportunity to secure infrastructure delivery in a coordinated and phased manner alongside development. This reflects the principles of the NPPF, which emphasises the importance of aligning infrastructure provision with growth. The scale of LNOS provides the critical mass necessary to support new facilities and services on-site, reducing pressure on existing infrastructure and helping to create a sustainable and self-supporting neighbourhood. Delivery of these facilities will be refined through future master planning, planning applications and ongoing engagement with infrastructure providers.

7.0 Affordable Housing Delivery

7.1 Introduction

7.1.1 This section explains how the Council has arrived at the requirement for Land North of Southend (LNOS) to provide 45% affordable housing. It draws together the findings of the Southend-on-Sea Infrastructure Delivery Plan 2026 (IDP) and the Southend-on-Sea Local Plan Viability Study (September 2026), having regard to the National Planning Policy Framework (December 2024) and national Planning Practice Guidance on viability.

7.2 National Policy Context

7.2.1 Paragraph 35 of the NPPF requires plans to set out the contributions expected from development. These include the levels and types of affordable housing required and other infrastructure such as education, health and transport. Such policies should not undermine the deliverability of the plan. Paragraph 59 explains that planning applications which comply with up-to-date policies setting out these contributions should be assumed to be viable. The policy requirements for LNOS therefore need to be properly tested at the plan-making stage.

7.2.2 For land released from the Green Belt, the NPPF sets a specific expectation. Paragraph 67 requires the affordable housing requirement for such land to be set higher than would otherwise apply, and to require at least 50% of the housing to be affordable, unless this would make the development of these sites unviable when tested in accordance with national planning practice guidance on viability. Paragraph 156 sets out the ‘Golden Rules’. Development on land released from the Green Belt should contribute affordable housing reflecting the relevant requirements, together with necessary improvements to local or national infrastructure and access to good quality green spaces. The Golden Rules therefore expect affordable housing and necessary infrastructure to be delivered together, so the affordable housing requirement cannot be set without regard to the cost of that infrastructure.

7.2.3 As explained earlier in this paper, LNOS involves the release of Green Belt land that is not grey belt, so the Golden Rules apply. The Council has therefore taken 50% affordable housing as the starting point. The question is whether that level can be delivered alongside the infrastructure needed to make the development

acceptable in planning terms, or whether the viability evidence justifies a lower figure.

7.3 Infrastructure Required to Support LNOS

7.3.1 As outlined in the previous section the IDP Infrastructure Schedule (Section 13 and Appendix C) sets out the infrastructure projects required to support the delivery of LNOS. These include new primary and secondary education provision, primary healthcare, emergency services, sports and recreation facilities, green infrastructure and the 'Southend Plus' package of highway, bus and active travel improvements identified through the Transport Modelling Assessment. The IDP classifies most of these projects as 'essential': required to support development, mitigate its impacts and ensure compliance with key policies.

7.3.2 The Infrastructure Schedule gives two cost figures for the essential infrastructure associated with LNOS:

- **£174.5 million at 2026 prices.** This is the estimated cost at today's prices.
- **£204.5 million at the prices expected when the works are built.** This reflects alternative transport project costs estimated at 2034 prices.

7.3.3 The difference between the two figures reflects expected cost inflation between now and construction, not a difference in the scope of infrastructure required.

7.3.4 The IDP is clear that these costs are indicative. They are the best estimates available at the current time, will be indexed over time, and will be refined further with infrastructure providers. Final costs will be established when development comes forward, through engagement with statutory providers and the negotiation of section 106 agreements.

7.3.5 There is uncertainty in both directions. On one hand, some infrastructure has not yet been costed by the relevant delivery body and is therefore excluded from the totals. For example, community infrastructure costs are currently to be confirmed, the education figures exclude post-16 and special educational needs provision, and the health figures cover primary care only. On the other hand, some estimates may prove higher than will ultimately be required:

- Estimates provided by infrastructure providers are likely to include an element of contingency.

- Some site access and junction works identified in the IDP may already be covered, at least in part, by the site works allowance included in the Viability Study appraisals.

7.3.6 The IDP does not assume that all infrastructure associated with LNOS will be funded by developer contributions. For the transport schemes in particular, it anticipates a mix of CIL and section 106 contributions and additional funding sources, and the Council will continue to explore external funding, including national programmes. Given the strategic nature of several items, such as new schools and highway improvements, funding contributions may come forward from bodies such as the Department for Education, Homes England, National Highways and the City Council itself. However, no such funding has been secured at this stage, and the Council has not relied upon it in setting the affordable housing requirement.

7.4 Viability Evidence

7.4.1 The Viability Study includes a site-specific appraisal of LNOS based on 4,900 dwellings, 12,500 sq m of employment floorspace and land for schools, health and community facilities and green infrastructure. The appraisal includes:

- CIL at the adopted Zone 1 rate of £30.77 per sq m;
- section 106 contributions of £5,000 per dwelling; and
- site works costs of £22,000 per dwelling (£107.8 million), covering site enabling works such as spine roads, site access and junction improvements.

7.4.2 LNOS was tested at 30%, 35%, 40%, 45% and 50% affordable housing. In line with standard practice for plan-making, the base appraisals use current costs and values.

7.4.3 Table 7.7 of the Viability Study shows that LNOS remains viable across the full range tested. The residual headroom above the benchmark land value ranges from £42,644 per dwelling at 30% affordable housing to £24,164 per dwelling at 50%. However, the Study cautions that the full infrastructure costs from the IDP had not been confirmed when the appraisals were prepared. It notes that those costs could materially affect the headroom shown, particularly at LNOS, which will form a new neighbourhood requiring substantial new infrastructure.

7.4.4 Table 7.8 of the Viability Study adds together the CIL and section 106 contributions tested in the appraisals and the remaining residual headroom. This gives the total amount theoretically available from LNOS to fund infrastructure, beyond the site

works already allowed for, at each level of affordable housing. Sensitivity Test 2 repeats this exercise using forecast changes in sales values and build costs over the next five years (Table 7.12). The results are summarised in Table 7.1 below.

Table 7.1 – Funding available for infrastructure at LNOS by level of affordable housing (Viability Study Tables 7.8 and 7.12)

Affordable housing	Available at current costs and values (Table 7.8)	Available at forecast costs and values (Table 7.12)
35%	£220.4m (£45,000 per dwelling)	£317.5m (£65,000 per dwelling)
40%	£197.0m (£40,000 per dwelling)	£289.3m (£59,000 per dwelling)
45%	£173.7m (£35,500 per dwelling)	£261.0m (£53,000 per dwelling)
50%	£150.3m (£31,000 per dwelling)	£232.7m (£47,000 per dwelling)

7.4.5 The Viability Study recommends that residential development in the Green Belt, including LNOS, should be expected to support affordable housing of up to 45%, subject to review against the final IDP and any associated infrastructure funding requirements. It advises that the Council should consider the final IDP evidence carefully when deciding the right balance between infrastructure funding and affordable housing delivery.

7.5 Bringing the Evidence Together

7.5.1 For a meaningful comparison, infrastructure costs and development values need to be on the same price basis. The primary comparison is therefore between the IDP cost estimate at 2026 prices (£174.5 million) and the funding available at current costs and values in Table 7.8 of the Viability Study.

7.5.2 On this basis, 45% affordable housing would generate about £173.7 million towards infrastructure. This is almost exactly the £174.5 million estimated cost of the essential infrastructure at 2026 prices. At 50% affordable housing, the £150.3 million available would fall about £24 million short. On current costs and values, therefore, 45% is the highest level of affordable housing that the evidence shows can be delivered alongside the essential infrastructure identified in the IDP. A requirement of 50% would depend on external funding that has not been secured, or on cost reductions that are not yet evidenced.

7.5.3 The forecast scenario in the Viability Study gives a second, forward-looking view. Under forecast costs and values, the funding available at 45% affordable housing (£261 million) would be well above the estimated cost of the essential

infrastructure at future prices (£204.5 million), leaving a substantial margin. The funding available at 50% (£232.7 million) would also exceed that figure. However, the forecast runs only five years ahead, whereas most of the future-price cost estimates relate to 2034. Its results also depend on house price growth outpacing build cost inflation, which is not certain over the period during which LNOS will be built out.

7.6 Taking a Pragmatic Approach to Uncertainty

7.6.1 In his letter to the Planning Inspectorate of 15 July 2026, the Minister of State for Housing and Planning stated that:

> *"where a robust evidence base exists and there is a reasonable basis for concluding that allocations are capable of delivery over the plan period as a whole, I expect concerns regarding deliverability and viability to be approached pragmatically".*

7.6.2 The letter asks that allocations be assessed against their prospects of delivery over the plan period as a whole, rather than solely against current market conditions. It also confirms that proportionate evidence is still required to support allocations and policies.

7.6.3 The Council has taken a pragmatic approach in both directions. It has set the requirement on the basis of current costs and values, consistent with the Viability Study's base appraisals. It has not raised the requirement above 45% in reliance on forecast market improvements, which are uncertain and extend only part way through the delivery period. Nor has it relied on external funding that has not yet been secured. At the same time, the forecast scenario gives reasonable confidence that a 45% requirement will remain deliverable as the development progresses. This is despite the following uncertainties:

- infrastructure items that have not yet been costed, such as community facilities and post-16 and special educational needs education; and
- changes to phasing and delivery arrangements as the scheme is masterplanned in more detail.

7.6.4 Factors that could ease the cost burden on development, including contingency allowances in the cost estimates, overlap with the site works allowance and external funding, give further resilience but have not been relied upon.

7.7 Conclusion

7.7.1 Having regard to all of these factors, the Council considers that requiring 45% affordable housing at LNOS is a reasonable, pragmatic and evidence-based approach.

7.7.2 A requirement of 50% has not been adopted because, comparing costs and values on the same current price basis, the funding available at that level falls about £24 million short of the estimated cost of the essential infrastructure. Meeting it would depend on forecast market improvements, unsecured external funding or cost reductions that are not yet evidenced, and it would leave no margin for infrastructure not yet costed or for additional policy costs.

7.7.3 A requirement below 45% is not justified because:

- on the same price basis, 45% generates enough funding to cover the estimated cost of the essential infrastructure;
- the forecast scenario indicates substantially greater capacity as the development progresses;
- the Viability Study recommends affordable housing of up to 45%; and
- each 5 percentage point reduction would mean about 245 fewer affordable homes at LNOS, at a time of acute affordability pressure in Southend.

7.7.4 A requirement of 45% would deliver about 2,205 affordable homes. The departure from the 50% starting point is justified by viability evidence tested in accordance with national guidance and informed by the infrastructure requirements identified in the IDP. In line with the Viability Study's recommendations, the Council will continue to monitor viability and infrastructure costs as part of the Plan's implementation and review.

8.0 Conclusion and Planning Balance

8.1.1 The Council recognises that the allocation of Land North of Southend would result in the release of Green Belt land and the loss of a significant area of agricultural land. These impacts have been fully assessed through the Green Belt Assessment, Sustainability Appraisal and wider evidence base and have been afforded significant weight in the Council's decision-making process.

8.1.2 The evidence demonstrates that Southend is subject to exceptional development pressures arising from substantial housing, affordable housing, employment, education and infrastructure needs. Extensive work has been undertaken to maximise development opportunities within the existing urban area and to explore reasonable alternative options prior to considering Green Belt release.

8.1.3 The Council has concluded that these measures alone are insufficient to meet identified development needs and that strategic-scale growth opportunities are required. Land North of Southend represents one of the very few options capable of delivering housing, employment opportunities, supporting infrastructure, education provision and green infrastructure at the scale required.

8.1.4 The Sustainability Appraisal identifies that the allocation of LNOS would: A) reduce the amount of unmet housing need arising from the Plan; B) provide 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) deliver a large proportion of family and affordable homes; D) provide new employment land; and E) be relatively unconstrained in some environmental respects, notably in terms of biodiversity and the historic environment and arguably water.

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

8.1.6 The release of sites CA002, HE143, HE145 and CA003 would result in a significant reduction of Green Belt land within the Southend administrative area. However, the wider Green Belt function around Southend is already largely

dependent on land within neighbouring authorities, particularly Rochford and Castle Point, which play the primary role in maintaining separation between settlements and preventing coalescence. Consequently, although these sites collectively comprise a considerable proportion of Southend's Green Belt, their development would not fundamentally compromise the integrity or strategic function of the wider Green Belt. The remaining Green Belt parcels to the west and east of Southend would remain physically and functionally distinct and would continue to serve Green Belt purposes effectively.

8.1.7 Having considered all relevant factors, the Council concludes that exceptional circumstances exist to justify the Green Belt release and associated boundary alterations through the Local Plan. This conclusion is based upon the clear evidence of unmet development needs, the absence of reasonable alternative options, the ability of the allocation to support sustainable patterns of development and infrastructure delivery, the site-specific considerations affecting the site itself, and the findings that the remaining Green Belt in Southend would not be fundamentally undermined, whilst the wider Green Belt would continue to perform its strategic functions following release of the site.

8.1.8 The Council has also considered the opportunities for compensatory improvements, including enhanced public access, strategic green infrastructure, biodiversity enhancement and recreational provision associated with the allocation.

8.1.9 The allocation provides the opportunity to deliver a comprehensively planned new neighbourhood of approximately 4,900 homes, supported by new schools, healthcare facilities, community infrastructure, employment opportunities, transport improvements, sports and recreation facilities, and an extensive multifunctional green infrastructure network. The scale of development enables infrastructure to be planned and delivered alongside growth, ensuring that the development contributes positively to the creation of a sustainable, accessible and resilient community.

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