



Southend Local Plan Issues and Options

Land at Bournes Green, Southend

Prepared on behalf of Bellway Homes

April 2019

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Prepared by:	Sam Hollingworth MRTPI Emma Gladwin BSc (Hons) MSc MRTPI
Approved by:	Richard Clews MSc MRTPI
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APPENDICES

Appendix A – Site Location Plan

1.0 Introduction

- 1.1 These representations are submitted on behalf of Bellway Homes in response to the consultation on Southend Borough Council's (the Council) Local Plan Issues and Options (SLPIO). These representations relate to Bellway Homes' land interest at Bournes Green, as shown on the Site Location Plan at Appendix A.
- 1.2 The SLPIO is the first consultation on the emerging Local Plan, setting out spatial options for meeting housing and economic needs. The SLPIO does not set out specific sites for growth, only spatial options and a broad location for a new settlement north of Fossetts Farm, Garon Park and Bournes Green Chase.
- 1.3 The boundary of Southend is quite tight to the existing built up area, with limited options for growth within the boundary. As set out within both the SLPIO and these representations, it is therefore important that the Council continue to work with neighbouring authorities to meet the identified needs.
- 1.4 Land at Bournes Green is currently agricultural land adjacent to the existing built up area, bordered by roads including the A13 to the south and Southend Road to the north. The site covers an area of approximately 91 ha and has been previously submitted to the Council through the Call for Sites process in 2017.
- 1.5 The site is in close proximity to a range of services and facilities, including public transport, and is considered a suitable location for growth as set out in further detail within this representation.
- 1.6 The site is currently defined as within the Green Belt, but we do consider that exceptional circumstances exist to revise Green Belt boundaries and release this area of land to meet housing and other needs.
- 1.7 This representation considers the housing need within the Borough, the three spatial strategy options within the SLPIO and the site at Bournes Green.

2.0 Housing Requirement

- 2.1 Since the preparation of the SLPIO, an updated National Planning Policy Framework (NPPF) and accompanying Planning Practice Guidance (PPG) have been published. These updates clarify that in calculating housing requirement using the Standard Method, 2014-based subnational household projections should be used.
- 2.2 Using the 2014-based subnational household projections, considering annual average household growth between 2019 and 2029, and having regard to the latest (2018) ratio of median house price to median gross annual workplace-based earnings for the Borough published by the ONS (10.27), the Borough's annual housing requirement is 1,177 dwellings. Over 20 years this equates to a need for 23,540 new homes.
- 2.3 The total need across South Essex, using the Standard Method, is in excess of 4,000 dwellings per annum.
- 2.4 The NPPF (paragraph 11) requires strategic policies – such as those that the new Southend Local Plan will provide – to seek to meet the housing requirement as a minimum.
- 2.5 The NPPF (paragraph 22) states strategic policies should look ahead over a minimum 15-year period from adoption, and should seek to anticipate and respond to long-term requirements and opportunities. In preparing this new Local Plan, we would urge the Council to be mindful of likely timescales to adoption and to ensure the Local Plan will address, as a minimum, development requirements 15 years from this point.
- 2.6 In addition, the Borough's growth is heavily constrained by land allocated in the most recent Development Plan as Green Belt. The implications for the spatial strategy are discussed later in this response, but in terms of the overall quantum of housing the new Local Plan should seek to provide, we urge the Council to be mindful that the NPPF states amended Green Belt boundaries should be capable of enduring beyond the plan period. As such, in considering the strategy for meeting development needs, the Council should seek to ensure development needs beyond the end of the plan period will not necessitate a review to the Green Belt. As such, we suggest there would be merit in the new Local Plan seeking to accommodate in the region of 20 years of development needs.

- 2.7 Also of relevance is the need to consider the requirement for different types of housing. The PPG¹ notes that the Standard Method for assessing housing need does not break down the overall figure into different types of housing, and that the need for particular sizes, types and tenures of homes as well as the housing needs of particular groups should be considered separately. The PPG goes on to state that, when producing policies to address the needs of specific groups, strategic policies will need to consider how the needs of individual groups can be addressed within the overall need established.
- 2.8 The Local Plan should seek to meet housing needs in full in the first instance, within the Borough and through joint working with neighbouring authorities. The SLPIO sets out three potential options for the spatial strategy to meet this need, which we consider in turn in the following sections.

¹ PPG Paragraph: 017 Reference ID: 2a-017-20190220

3.0 Spatial Strategy: Option 1

3.1 Option 1 is for all development to be provided within the existing residential area.

3.2 As the SLPIO acknowledges, this will only deliver a limited number of homes of between 5,200 and 9,100 – significantly short of meeting needs in full.

3.3 In addition, there are a number of other concerns with relying on such an approach. The SLPIO identifies a number of these:

- Risks of overdevelopment affecting the amenities and character of established residential areas;
- Limited opportunities/high costs of providing new services and facilities such as schools, health and community facilities;
- Potential loss of employment land to housing development;
- Potential detrimental impact on skyline and key views of tall buildings in more sensitive locations;
- Potential oversupply of small flats.

3.4 We concur with all of the above. In respect of the issue raised of the potential oversupply of flats, we would wish to stress this point in particular and note that it is important the Local Plan facilitates the delivery of the types of homes that are needed, in addition to simply the quantity. Between 2002 and 2018, 73% of gross completions were flats, offering limited choice for residents. It is important that the Local Plan facilitate the delivery of a range of house types and consider needs of different types of homes.²

3.5 In addition, the deliverability of this option could be challenging. For example, in respect of loss of employment land for housing, it is not clear that employment uses will be willing to vacate sites. Such a concern would be in addition to the economic and social impact of loss of employment land within the Borough.

3.6 The SLPIO also recognises that this option provides limited opportunities for the provision of new infrastructure. Reliance on this option would not provide any significant amount of land or financial contributions towards either improving existing or creating new infrastructure. This is a particularly pertinent concern due to the high level of

² PPG, paragraph: 017 Reference ID: 2a-017-20190220

congestion that already exists on the highways network within the Borough, with Option 1 unable to provide any improvements to this.

- 3.7 Given the designation of the A127 Bell Junction as an Air Quality Management Area and the Air Quality Action Plan seeking to tackle road transport related pollution and improve health outcomes, the Council should take the opportunity through the Local Plan to seek to alleviate congestion and promote sustainable transport. Option 1 will not achieve this as it is likely to result in smaller scale development which will not deliver or provide significant financial contributions towards the necessary transport improvements.

4.0 Spatial Strategy: Option 2

- 4.1 Option 2 is to focus development within the existing built up area, in specific locations such as the town centre, airport and main passenger corridors; with some development on the urban edges on greenfield and Green Belt land in Southend.
- 4.2 Again, a major concern with reliance on this option would be its inability to meet development needs in full, as the SLPIO recognises. A number of the concerns with increasing densities set out in relation to Option 1 would be applicable to this aspect of Option 2 also.
- 4.3 However, it is recognised that this approach has benefits. One of which not identified in the SLPIO is the potential for this approach to help deliver homes in the early years of the plan period. Large scale, major strategic development often has significant lead-in times, given the coordination of multiple landowners, infrastructure providers and authorities required to deliver such schemes³. Smaller scale edge of settlement development can be on land under single ownership or ownership with a limited number of developers, and with elements which can be delivered without requiring major infrastructure provision.
- 4.4 The timing of delivery is an important aspect, given the need for Local Planning Authorities to ensure a five-year housing land supply throughout the plan period (NPPF, paragraph 73); and mindful of the current housing shortage within the Borough, exemplified by the Housing Delivery Test 2018 measurements, which indicated only 49% Borough's needs have been met over the last three years.
- 4.5 If this option were to be pursued, we suggest it would need to be in conjunction with large strategic growth to the north of the Borough (Option 3) as Option 2 will not, alone, be able to deliver the same level of benefits as with those associated with Option 3.

³ Nathaniel Lichfields (2016) Start to Finish; MHCLG (2018) Independent Review of Built Out

5.0 Spatial Strategy: Option 3

Joint Working

- 5.1 Option 3 combines Option 2 with working with neighbouring authorities to develop a comprehensive new settlement across Borough boundaries (strategic scale development).
- 5.2 We note that under the Duty to Cooperate, Local Authorities are required to work with one another to address strategic issues. This point is reiterated at paragraphs 24 to 27 of the NPPF, and at paragraph 35 of the NPPF it is confirmed that effective joint-working is a prerequisite of a sound Local Plan
- 5.3 Neighbouring authorities are required to consider the unmet needs of their neighbours (NPPF paragraphs 11, 35, and 60). Joint working is considered particularly important in the case of Southend-on-Sea Borough, given that the administrative boundary is drawn relatively tightly around the existing settlement, with limited opportunities for growth without expanding into another administrative area.
- 5.4 Further to this, it is particularly pertinent to note that the South Essex Strategic Housing Market Assessment (2016) (SHMA 2016) identified Southend-on-Sea Borough as being part of a local housing market which also included the administrative areas of Rochford District and Castle Point Borough. As such, there would very much be logic in the respective Local Plans to explore how the housing needs of the local housing market area could be met between them, rather than simply looking to meet needs within defined administrative boundaries.
- 5.5 Authorities in South Essex have a history of working positively with one another going back over a number of years, and in particular in relation to Thames Gateway South Essex and, more recently, joint work on evidence base documents. The authorities are better placed than many to work collaboratively with one another for the benefit of their communities, and in 2018 the Association of South Essex Local Authorities (ASELA) was established, comprising Basildon Borough Council, Brentwood Borough Council, Castle Point Borough Council, Rochford District Council, Southend-on-Sea Borough Council, and Thurrock Borough Council.

- 5.6 A 2018 Memorandum of Understanding (MoU) for Strategic Planning in South Essex, signed by the members of ASELA, commits the authorities to working together to develop and achieve a vision for South Essex up to 2050 – the ‘South Essex 2050 Ambition’ (SE2050). ASELA has agreed that a ‘no border’ approach to address development needs is an appropriate strategy, reflecting the fact that whilst different areas of South Essex have their own distinct characteristics, identities and communities, these are not necessarily reflected in administrative boundaries and that there are clear functional relationships between the areas.
- 5.7 The SE2050 suggests that in addition to meeting the minimum housing needs of South Essex, with the right conditions to support growth, more could be achieved.
- 5.8 The authorities recognise that development of new garden communities could offer a strategic solution to growth; and that such an approach could significantly enhance housing opportunities and community facilities for local people, and support new commercial and employment hubs, creating centres of business excellence within the sectors of industrial opportunity.

Opportunity Land North of Southend

- 5.9 One such location identified for further consideration as an opportunity is London Southend Airport and the surrounding area.
- 5.10 London Southend Airport offers major national and international connectivity and has the potential to further increase destination opportunities. Significant surface access improvements are essential to realise the full economic potential of the airport. The area surrounding the airport is currently being developed as a major business park facility and has the potential to unlock significant new business, employment and residential opportunities across the wider area.
- 5.11 In January 2019, the South East Essex Strategic Growth Locations Assessment (SEESGLA) was published. This identified six broad locations comprising mainly undeveloped land beyond the urban extent of Southend as warranting assessment, and assessed each of these for their potential to accommodate strategic scale development. Only one was found to be potentially suitable following this exercise: North of Fossetts Farm, Garon Park and Bournes Green Chase (‘Sector D’).

- 5.12 The land identified under Sector D includes the land at Bournes Green promoted by Bellway Homes and other surrounding land controlled by different landowners/developers.
- 5.13 The SEESGLA states the Sector D area comprises predominantly open fields with some sporadic housing, located to the south east of Rochford, and north of the built up area of Southend from Warners Bridge to Star Lane.
- 5.14 The SEESGLA describes this land as comprising low lying estuary arable land, mostly good quality agricultural land, south of the River Roach Estuary, with scattered farmsteads and former farm cottages, a number of which are listed. It notes the only Conservation Area is the churchyard of Shopland Church; and recognises that part of the estuary is protected by the River Roach and Crouch Estuaries Special Protection Area, and a large proportion of the sector is designated as Coastal Protection Belt in the Rochford Core Strategy and Allocations Plan (currently under review).
- 5.15 We note that a number of the constraints identified above are focused on the north element of this parcel, located furthest from Southend, as illustrated on Map 4 of the SEESGLA.
- 5.16 Table 6 of the SEESGLA considers Sector D's suitability to accommodate strategic scale development against a number of criteria. In respect of environment, this again notes that the constraints are focused within the northern extremes of the parcel, with the majority of the sector relatively unconstrained. Similarly, in respect of landscape and topography, historic environment, and geo-environmental considerations, the most significant constraints tend to be focused in the northern part of the sector, with the majority of the parcel relatively unconstrained. The SEESGLA notes that infrastructure enhancements will be required, as would be expected for any strategic scale development.
- 5.17 The emerging evidence base supports strategic growth to the north of Southend to the east of London Southend Airport ('Sector D' in the SEESGLA), and exploration of Option 3 of the SLPIO in respect of this location. Whilst the wider area is subject to a number of environmental, ecological and heritage designations which restrict development or have the potential to be adversely impacted by development, a cross-boundary development to the east of London Southend Airport could be delivered without adverse

impact on such areas. Furthermore, a development of this scale has the potential to be accompanied by significant environmental improvements, including through ecological enhancements and provision of substantial areas of landscaping and public open space.

5.18 A cross-boundary development within this location has the potential to engender significant social, economic and environmental benefits for both Rochford District and Southend-on-Sea Borough; helping to meet the area's development needs in a manner which minimises potential adverse impacts.

5.19 We note that Rochford District Council has previously consulted on its New Local Plan Issues and Options Documents in 2018. One of the options identified by this to address objectively assessed housing need is to work with neighbouring Local Planning Authorities to meet housing need across the South Essex Housing Market Area, with Rochford clearly willing to work with Southend to deliver housing to meet the identified needs.

5.20 We consider such growth to the north of Southend should not be functionally separated from the existing residential areas of Southend. Such an approach would force development further into the Green Belt than would be otherwise necessary if it were to be integrated into the existing settlement. In addition, it would allow existing residents to benefit from the facilities and services that will be provided in the new growth location, and vice versa. Integration of the new growth location with the existing settlement will also help encourage future residents of the growth area to utilise Southend town centre, with resultant economic benefits for the town.

5.21 The SLPIO identifies a range of benefits that large scale strategic growth could deliver, as follows:

- Potential for significant improvements to existing highway accessibility provided as part of new settlement;
- Major new services and facilities provided such as schools, health and community facilities;
- A greater range of homes provided, such as family, affordable, older people housing;
- Retention of character and amenities of established residential areas;

- Protection of key employment areas and opportunity to provide additional employment within new settlement;
- New settlement providing new parks and access to greenspace;
- Existing parks, public gardens, woodland and coastline protected.

5.22 We concur with these benefits. We note that a number are cited in relation, specifically, to a new settlement. We wish to stress that these benefits would also apply to large scale strategic growth connected with the existing settlement. Indeed, the benefits would be greater if the large scale growth were to be integrated with the existing settlement. For example, a strategic scale development, well-connected to the existing town, providing new parks and access to greenspace for new and existing residents would be of greater benefit to the existing community than a new settlement detached from Southend providing such parks and greenspaces, but not accessible to existing communities.

5.23 The land at Bournes Green promoted by Bellway Homes is adjacent to the existing built up area and well connected to the existing settlement. The site does fall within the large strategic scale growth area currently identified for consideration, but given its location it could also come forward in the early part of the plan period and connect into the wider strategic growth as this development progresses.

5.24 Section 8 of the SLPIO sets out that some existing schools in the Borough are already at or close to capacity, with only a limited number of locations where there is room to expand. New primary and secondary schools will therefore be needed to accommodate future development needs, which require a reasonable amount of land, a willing landowner and a significant amount of funding. Options 1 and 2 within the SLPIO are unlikely to provide these and will not provide sufficient infrastructure accordingly.

5.25 Large scale growth through either an urban extension or new settlement will provide the critical mass of housing to incorporate new schools, both primary and secondary. The identification of large scale growth within the Local Plan and collaborative working between the Council, infrastructure providers and landowners/developers at this stage also provides the opportunity for a large scale development to be suitably masterplanned and for all parties to be realistic about what development can come forward.

5.26 As recognised within the SLPIO, there is a pressing need for more affordable homes within the Borough, with approximately 600 affordable homes delivered since 2007

(around 18% of all housing completions). A large scale urban extension or new settlement can provide a significant amount of new affordable housing which is otherwise unlikely to be delivered, as demonstrated by the historic completion rates.

5.27 The SLPIO identifies the disadvantages to Option 3 as being loss of greenfield land and Green Belt; and loss of some agricultural land.

5.28 In respect of the loss of greenfield land, whilst the NPPF (paragraph 117) states that in seeking to accommodate development needs, Local Plans should seek to make as much use as possible of previously developed land while achieving appropriate densities (NPPF paragraph 122) and securing well designed, attractive places (NPPF Chapter 12). The NPPF does not preclude the allocation of greenfield land on this basis.

5.29 To ensure that existing neighbourhoods and communities are not changed in an unsympathetic way, there is a need to consider greenfield sites in Southend.

5.30 Whilst a strategic scale development will potentially entail the loss of a considerable amount of greenfield land, this should be considered in a strategic context and in respect of the area as a whole, in which the vast majority of greenfield land will be retained.

5.31 As part of a large scale development, opportunities can be taken for recreation to be integral to the delivery of development, opening up sites for public use. Paragraph 118 of the NPPF seeks to encourage multiple benefits from both urban and rural land, including schemes which would improve public access to the countryside.

Green Belt Release

5.32 As recognised within the SLPIO, there is limited capacity within the existing built up area to meet development needs and the Council need to consider releasing land from the Green Belt to seek to meet the identified growth.

5.33 The NPPF recognises that Green Belt boundaries can be altered, setting out this should be through a Local Plan and only where exceptional circumstances are fully evidenced and justified (paragraph 136).

5.34 Whilst 'exceptional circumstances' are not defined, case law provides a framework for the consideration of the issue. In particular, the judgment in *Calverton Parish Council v Nottingham City Council & Ors* [2015] EWHC 1078 (Admin) suggests (paragraph 51) that the following matters are relevant in the consideration of whether exceptional circumstances exist:

- The scale of the objectively assessed need;
- Constraints on supply/availability of land with the potential to accommodate sustainable development;
- Difficulties in achieving sustainable development without impinging on the Green Belt;
- The nature and extent of the harm to the Green Belt; and
- The extent to which impacts on the purposes of the Green Belt may be mitigated as far as practicable.

5.35 In respect of the first three points, the Borough has an acute housing need; there are evidently severe limitations on options to meet this need without altering the Green Belt; and, similarly, options to deliver sustainable development without amendments to the Green Belt boundary are very limited.

5.36 In respect of the fourth and fifth points, we note no Green Belt assessment has been published at this stage and is to be undertaken as the Local Plan progresses. When assessing land at Bournes Green against the five purposes of the Green Belt (paragraph 134 of the NPPF), we consider that the site does not significantly contribute to these purposes and any harm that does result can be mitigated.

5.37 Paragraph 138 of the NPPF sets out that the need to promote sustainable patterns of development should be considered when reviewing Green Belt boundaries. The site is in an already sustainable location, with a wide range of services and facilities available nearby. Regular bus services and Thorpe Bay Railway Station are in close proximity of the site to facilitate sustainable travel. A large scale development can provide further opportunities to increase the sustainability of the area, including new schools, facilities and transport improvements.

- 5.38 Paragraph 138 of the NPPF further sets out that Local Plans should demonstrate how the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of land. The site is currently private farmland, providing opportunities for a range of new accessible open spaces, high quality landscaping and other measures to improve the ecological and landscape benefits of the site as part of any development.
- 5.39 Overall we consider that given the Borough's housing and infrastructure need, and constrained boundary, the Council do need to undertake a Green Belt assessment and consider revising Green Belt boundaries as part of the emerging Local Plan. We consider that it will be possible to demonstrate exceptional circumstances in accordance with paragraph 136 of the NPPF and the Calverton judgment, and that land at Bournes Green in particular is suitable for release from the Green Belt, providing a multitude of benefits and opportunities.

Conclusion on Option 3

- 5.40 We note that ASELA have agreed to prepare a Joint Strategic Plan (JSP), which is intended to provide the spatial framework for the first 20 years of the SE2050. Whilst we support the collaborative approach being undertaken by the authorities, we would caution against over reliance on the JSP to deliver development in the sub-region. As the Council will be aware, the preparation of Local Plans is a long and resource-intensive process which can take a number of years. Preparing such a document requiring agreement of multiple authorities will doubtless prove a considerable challenge.
- 5.41 We suggest the Council will need to be mindful that there is an acute housing shortage now within the Borough, and urgent action is required to address this. In this respect, we would again refer the Council to Housing Delivery Test 2018 measurements, which indicated only 49% Borough's needs have been met over the last three years; and the current lack of a supply of land to address this situation moving forward. Furthermore, the NPPF requires a five-year housing land supply to be in place at all points in the plan period – meeting such needs should not be delayed unnecessarily, given the importance of providing sufficient homes.

- 5.42 We are of the view that there is potential to form a spatial strategy which will enable the long-term benefits of large-scale strategic growth associated with Option 3 to be realised, whilst negating its key weakness (i.e. difficulty in meeting short-term needs).
- 5.43 The land at Bournes Green and surrounding land was the only area identified as having the potential for large scale strategic growth within the study undertaken by the SEESGLA. Large scale growth in this area has the potential to deliver a significant amount of new housing, alongside a range of other benefits. No other areas in Southend were identified as having potential for strategic growth.
- 5.44 Land at Bournes Green is ideally placed to be able to form part of such strategic growth and to contribute towards the sustainable delivery of homes in the area. It is not subject to constraints that would limit its development and is considered suitable for development. It is being actively promoted by an established house-builder with a track record of delivery and is not subject to any legal or ownership constraints that would prevent its development – it is an achievable and available site for homes.
- 5.45 The site can form part of a wider strategic development, and given its location adjacent to the existing built up area, it could begin to deliver homes in the early part of the plan period. This would assist in providing a five year housing land supply and homes to meet the current need. Development could then continue on surrounding land to provide the strategic scale growth, delivering a range of homes in a sustainable manner throughout the plan period.

6.0 Conclusion

- 6.1 Southend Borough faces many challenges in relation to housing, with the housing need not having been met in recent years and issues of affordability continuing to worsen. Through the emerging Local Plan, the Council have the opportunity to seek to address these issues, identifying sites and a spatial strategy to meet housing and economic needs.
- 6.2 As identified within the SLPIO, given the constraints of the Borough, it will not be possible for the Council to meet housing and economic needs within the existing defined settlements and they do need to consider other options for meeting these needs.
- 6.3 One potential location for large scale strategic growth has been identified through joint working with Castle Point and Rochford Councils, being land to the north of Southend which extends into Rochford District.
- 6.4 Whilst this area is predominantly Green Belt at the current time, the Councils should take the opportunity to review this designation through the emerging Local Plans for the respective areas. Southend Council should review the land within its boundary for Green Belt release, and we believe the outcome will be that exceptional circumstances can be identified to justify releasing some land.
- 6.5 Land at Bournes Green is one such area that we consider suitable for release from the Green Belt for development. A significant amount of housing can be provided on the site alongside landscaping, open space and other infrastructure and facilities.
- 6.6 Being located adjacent to the existing developed area, the site is well located to deliver housing in the early part of the plan period. Such development would be sustainable and assist in providing housing to meet short term needs. With the site controlled by a national housebuilder, Bellway Homes, they can commit to delivery within the early part of the plan period, working alongside the Council to ensure delivery occurs.
- 6.7 A larger scale strategic development could then follow on surrounding land, delivering housing throughout the plan period.
- 6.8 A large scale development can provide a wide range of infrastructure and services, including new primary and secondary schools and transport improvements. As

recognised within the SLPIO, existing highways are very congested at peak times and improvements are needed already. Only large scale development can facilitate such improvements, with small schemes not generating the level of funding required.

- 6.9 Land north of Fossetts Farm, Garon Park and Bournes Green Chase was the only area identified as having the potential for strategic growth within the recent study undertaken by SEESGLA. As such it provides the logical location for further assessment and to accommodate growth within the emerging Local Plan.
- 6.10 Overall we consider that a range of options will be needed for housing and other needs to be met within the Borough. No single option will provide the solution. Options 1 and 2 provide significantly less than the housing needed. Option 3, incorporating a mix of the other options alongside a new strategic scale development, is the only option for the Council to meet the identified housing needs.
- 6.11 We welcome the opportunity to work alongside the Council in the preparation of the new Local Plan to facilitate the early delivery of housing on land at Bournes Green.

Appendices

Appendix A

Land at Bournes Green, Southend-on-Sea

