

Town and Country Planning Act 1990 – Section 78
Town and Country Planning (Development Management Procedure) (England) Order 2013
Town and Country Planning (Inquiries Procedure) (England) Rules 2000

Appeal by Countryside Partnerships (Eastern Home Counties)

Against the decision of Castle Point Borough Council to refuse to grant planning permission
to:

***“Construct 173 No. dwellings including public open space, landscaping, access,
drainage, parking, servicing, utilities and all associated infrastructure and ancillary
buildings”***

at land at Brook Farm adjoining 451-469 Daws Heath Road, Hadleigh, Essex

Appeal Ref: APP/M1520/W/24/3351658

Updated Statement of Common Ground on Housing Land Supply

between

Castle Point Borough Council

&

Countryside Partnerships (Eastern Home Counties)

Signed



Date 16/01/2025

Stephen Garner – Assistant Director Development Services

On behalf of Castle Point Borough Council

Signed

Ben Pycroft

Date 16/01/2025

BEN PYCROFT (Emery Planning)

On behalf of Countryside Partnerships (Eastern Home Counties)

Updated Statement of Common Ground on Housing Land Supply

1. Introduction

- 1.1. This updated Statement of Common Ground (SoCG) on Housing Land Supply follows the round table session (RTS) on housing land supply, which took place on day 1 of the Inquiry on 15th January 2025. It supersedes the previous version of the SoCG, which was signed by both parties on 10th January 2025.

2. Matters of agreement

The base date and the 5YHLS period

- 2.1. It is agreed that the base date is 1st April 2024 and the 5 Year Housing Land Supply (5YHLS) period is to 31st March 2029.
- 2.2. It is agreed that sites that were not “deliverable” at the base date should not be included in the 5YHLS.

Housing requirement for the 5 year housing land supply calculation

- 2.3. In accordance with paragraph 78 of the December 2024 Framework, the 5YHLS should be measured against the local housing need calculated using the standard method. It is agreed that this is 701 dwellings per annum.

The latest Housing Delivery Test (HDT) result and 20% buffer

- 2.4. It is agreed that the latest HDT result (2023 result) is less than 85% (it is 54%) and therefore the 20% buffer applies.

A 5YHLS cannot be demonstrated

- 2.5. Both parties agree that a 5YHLS cannot be demonstrated in accordance with the Framework. The extent of the deliverable supply is not agreed.

Changes to the deliverable supply as set out in the AMR

- 2.6. The Council’s Authority Monitoring Report (AMR, CD7.29) states that the deliverable supply at 1st April 2024 is 1,143 dwellings. For the purposes of this appeal only, both parties agree that the following adjustments should be made.

Table SOCG I – Agreed changes to the deliverable supply as set out in the AMR

Ref:	Address	No. of dwellings in the 5YHLS in the AMR	Agreed deliverable supply for the purposes of this appeal only	Difference
HO15	Land south of Scrub Lane	49	0	-49
HO17	Hadleigh Island Site	40	0	-40
HO22	Land at Thames Loose Leaf	12	0	-12
HO28	Land at Admiral Jellicoe	24	0	-24
	Extant planning permission at 1 st April 2024	494	375	-119
	SHLAA Policy Compliant & Expired Consents	36	0	-36
	Brownfield Register	100	0	-100
	Windfall allowance	180	0	-180
	Total			-560

3. Matters of disagreement

The extent of the deliverable supply

- 3.1. The extent of the deliverable supply is not agreed. The Council considers for the purposes of this appeal only that the deliverable supply at 1st April 2024 is 583 dwellings. The Appellant considers that the deliverable supply at 1st April 2024 is 463 dwellings.
- 3.2. The reason for the difference of 120 dwellings between the two parties is set out in the following table:

SOCG Table 2 – Disputed site

Ref:	Address	Status at 1 st April 2024 as set out in the AMR	No. of net dwellings in the 5YHLS disputed
HO25	Land at Thorney Bay	Proceeding under existing consents	120
	Total		120

- 3.3. This site was discussed at the RTS.
- 3.4. The respective deliverable supply figures against the 5YHLS requirement are shown in the following table.

SOCG Table 3 – 5YHLS Positions at 1st April 2024

		Council	Appellant
	Requirement		
A	Annual local housing need	701	
B	5YHLS requirement without buffer (A X 5 years)	3,505	
C	5YHLS requirement plus 20% buffer (B + 20%)	4,206	
D	Annual 5YHLS requirement plus 20% (C / 5)	841	
	Supply		
E	5YHLS at 1 st April 2024	583	463
F	Supply in years (E / D)	0.69	0.55
G	Surplus / shortfall in 5YHLS (E – C)	--3,623	-3,743

[ENDS]