

Note of advisory meeting with Castle Point Borough Council on 25 July 2024 concerning the emerging Castle Point Plan – notes from the Inspector

Attendees

Louise Gibbons – Planning Inspector

Angela Hutchings – Chief Executive

Ian Butt – Director of Place and Communities

Amanda Parrott – Assistant Director Climate and Growth

Gavin Ball – Principal Planning Policy Officer

Maria Hennessy – Senior Planning Policy Officer

Matthew Amner – Planning Policy Officer

Neil Gale – Engagement Officer

(Phil Mileham (Observing) – Planning Inspector)

Overview

The Castle Point Local Plan was withdrawn in June 2022 and work was begun on the Castle Point Plan. Focus has been on local housing need, optimal use of brownfield sites, community engagement and placemaking. Issues and Options is currently out for consultation. Intending to move straight to Reg 19 and submit the plan before June 2025.

The Council provided useful background to the plan and raised specific issues and questions based on a draft agenda. The discussion also covered some of the work done since June 2022.

These notes aim to cover these as far as possible although some of them can only be resolved by the examining Inspector. Discussion and actions that Castle Point BC will undertake following the meeting are summarised in the following sections.

The visit and note are based on an initial and light touch assessment of the documents and information provided by the Council, with a focus on the discussion of agenda items. It is not binding on the Inspector/s who will be appointed to carry out the independent examination and who will take into account the evidence base, and representations made at the Regulation 19 consultation stage.

The advice was given on the basis of the December 2023 NPPF. We discussed the potential implications of any new NPPF (the consultation version published 30 July 2024).

Agenda items

- 1. Housing Need** – not using Standard Method (SM). Consultants have developed an alternative method using the 2018 population projections, adjusted to account for the 2021 census and its mid-year estimates. Approach

does not include the affordability ratio from the SM but accounts for vacancy rate adjustment, a C2 dwelling equivalent, concealed households and suppressed household formation. Resulting need is 255 per annum.

The work on the local approach also involved a survey of around 500 residents. This has helped inform potential policy approaches on affordable housing and housing mix but doesn't influence the housing need numbers.

Note that Exeter and Norfolk have also taken this approach. The Council will need to demonstrate what are the exceptional circumstances for why the SM is not being used. The Council will need to consider how the approach is consistent with paragraph 61 of the NPPF as well as the advice in the PPG on demonstrating exceptional circumstances. If the Castle Point local housing need approach is proposed in the Reg 19 plan, the Inspector/s examining the plan would assess this.

SM is around 350 per annum. Consulting on this as part of the Issues and Options. SA will also inform decisions – initial scoping looks at 6 development options.

Impact of Freeport not fully understood (and to some extent dependent on Thurrock Council) but the Council will need to address how the LHNA looks at the economy and reliance on skills training for residents taking up jobs at Freeport.

- 2. Meeting Housing Need** – housing technical paper focuses on urban capacity and includes call for sites plus other sites identified by council officers. Have looked at Green Belt sites, although small sites discounted. Capacity overall addresses sites capable of accommodating 6 or more.

Windfall figures are based on past history and include some discounting. The Council will need to provide information on the reasons for a drop in the yearly figures for the years 21/22 and 23/24 to demonstrate why the rates are nevertheless realistic.

The six development site options will need to be clearly explained including capacity on employment sites and consideration should be given to buffers.

Work is being undertaken on the N W of Thundersley site, which is complex with fragmented land ownership, and whether it can make a contribution to the supply.

- 3. Design Codes** – Working with Essex Place services. Discussed what potential options there were including whether to submit the code/s as part of the Plan. This could depend on whether the codes were being developed at a plan or more local area basis. If the former, it may be possible to do this within the plan. Whatever the nature of the code/s a policy would be needed to support their production.

4. Other matters

- a. **DtC** – working with South Essex authorities. Thurrock not currently addressing Freeport impact, which may have wider implications. Also working with the EA on flooding issues. NE on BNG but more difficult to work with in terms of HRA input.
- b. **Green Belt review** – stage 1 review already complete and does not need updating. Stage 2 will be undertaken before Reg 19 stage.
- c. **Viability Assessment** – all policies with a cost to the developer will need to be included within viability assessment. Work on this being undertaken.

5. Actions for the Council

- a. Housing need and meeting housing need to be explained in a Topic Paper. This will include addressing market signals as referred to in the NPPF. Affordable housing and the impact of the residents' survey will also be addressed in more detail. Windfall allowance to be explained. Buffer to be considered.
- b. The Council will assess what skills package would be in place to support the assumption that residents could take up jobs at Freeport rather than needing additional homes for new residents.
- c. A more detailed SHLAA which will also include how the Council would meet paragraph 70a of the NPPF (meeting the target of 10% of requirement on less than 1ha).
- d. In respect of design codes further discussion with Essex Place Services and potentially with the Office for Place.

Potential for additional face to face meeting late September/early October.