

CPBC New Local Plan

Housing Sites Options Topic Paper

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Introduction

The purpose of this topic paper is to set out the options for meeting housing land supply requirements for the New Local Plan, having regard to the policy context for plan-making set out in the National Planning Policy Framework, evidence related to the need for housing and delivery to date, and the evidence related to the individual sites being promoted for housing, ensuring that they are the most suitable locations, capable of being delivered, and where possible achieve related objectives.

National Planning Policy Framework

The National Planning Policy Framework (NPPF) requires local planning authorities to use their evidence base to ensure that their Local Plan provides a clear strategy for bringing forward sufficient land, at a sufficient rate, to address objectively assessed needs over the plan period. This should be achieved through the inclusion of strategic policies and include allocating sufficient sites to deliver strategic priorities of the area. Strategic policies should look ahead over a minimum of 15 years from adoption.

The strategy in the Local Plan is expected to, as a minimum, seek to meet the area's objectively assessed needs. The strategy for delivery of new development is expected to deliver a range of benefits to the built and natural environment; NPPF requires a focus on accommodating needs on brownfield/previously developed land. Objectively assessed needs should be determined in line with the standard method as set out in national planning guidance.

The strategy must be informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated, consistent with achieving sustainable development.

NPPF requires the Local Plan to identify a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirement with an additional buffer of at least 5% to ensure choice and competition in the market for land. It also requires local planning authorities to identify a supply of specific developable sites or broad locations for growth, for years 6 to 10 and, where possible for years 11 to 15.

In preparing such plans, local planning authorities may exceptionally alter Green Belt boundaries. When defining Green Belt boundaries local planning authorities should ensure consistency with the local plan strategy for meeting identified requirements for sustainable development. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the Local Authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its

identified need for development. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

Where necessary Local Plans should identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. The aim of identifying safeguarded land is to ensure that Green Belt boundaries will not need to be altered at the end of the plan period.

Housing Needs

The New Local Plan 2018 will put in place up-to-date planning policies, in accordance with the NPPF, and the PPG. The new Local Plan will have a timeframe of at least 15 years. During the Intervention process, consideration was given to the inclusion of housing delivery policies and site allocations to cover a shorter timeframe of between 5 to 10 years to ensure an upturn in housing delivery in the short term. In the longer term, the South Essex Joint Strategic Plan (JSP) would address any unmet needs in support of the aims of the South Essex 2050 vision. Although work on the JSP will continue in parallel to the development of the Castle Point Local Plan 2018, and will continue to be the strategic vehicle to deliver sustainable development across the area, it is necessary for the Local Plan to include a strategy for housing supply for at least 15 years, in accordance with NPPF.

The Local Plan 2018 will need to provide policies and proposals to deal with high housing pressure. In 2017, the Government consulted on a standard method for calculating housing needs, and this identified a need for 342 dwellings per annum in Castle Point. The standard method became part of national planning policy/guidance through the new NPPF in July 2018. Therefore the objectively assessed housing need (OAN) for Castle Point is 342 dwellings per annum. This translates to a total need over the plan period of 5,130 dwellings. If the Local Plan is to maintain a 5 year housing land supply, needs for the 5 years beyond the Plan period must also be considered. Therefore, over a 20 year period the total needs are 6,840 dwellings.

Whilst the plan must recognise nationally important physical and policy constraints, it is clear both from the evidence and advice from consultants appointed by the Ministry for Housing, Communities and Local Government, that some land in the Green Belt will need to be considered for new housing development in Castle Point Borough.

Evidence Base

NPPF requires the preparation of a *Strategic Housing Land Availability Assessment* and confirms that it should be used as the basis for identifying a supply of housing sites in the local plan. The assessment identifies a pool of sites within Castle Point that are suitable, available and achievable, and gives information on what the likely timescales for delivery may be, and the potential capacity of each site. It does not determine whether a site should be allocated for development; rather, it informs the decision making process for preparing a new local plan.

Supported by a call for sites process, the SHLAA 2018 considered a total of 477 potential sites which can be broken down as follows:

- 265 determined to be unsuitable, unavailable or unachievable and therefore cannot be taken forward for development.
- 212 sites determined to be suitable, available and achievable and should therefore be considered further through the Local Plan
- Of the 212:
 - 137 sites are located in the urban area and were considered to be potentially capable of delivering approximately 1,671 dwellings
 - 75 sites are currently within the Green Belt and were considered to be potentially capable of delivering approximately 3,776 dwellings

The Council has determined that the supply provided by the 212 sites should be taken forward as follows:

- 36 sites, offering capacity of approximately 398 dwellings to be included on the Brownfield Register Part 1- see Table 1 in Appendix 1. These sites will be further considered by the Council as part of the work to prepare a Part 2 Register.
- 74 sites, offering capacity for approximately 154 dwellings, where proposals for new housing development will be supported by criteria based policies in the Local Plan but, largely by virtue of their size/capacity, are not suitable for allocation through the Local Plan- see Table 2 in Appendix 2 for full details.

To ensure proposed site allocations are appropriate for inclusion in the Local Plan, must be subject to detailed assessments including transport, flood risk, sustainability appraisal etc. as set out throughout this Paper. Following the above stages, 102 sites remained for further consideration. These were subject to a high level assessment, where local knowledge and planning judgement were applied in order to determine whether it was necessary to undertake detailed assessment, or whether any should be removed from further consideration. This process revealed that some

sites formed groupings which could be considered as potential strategic allocations, stand alone sites which could form strategic allocations and a number of unsuitable sites:

- 38 sites were removed from further consideration - see Table 3 in Appendix 2 for details.
- 64 sites were grouped together for detailed consideration as part of 29 potential allocations in the Local Plan
- As part of the consideration of potential strategic groupings of sites, two sites previously deemed as likely to be unsuitable and/or unavailable through the SHLAA were identified as being located within the boundary of one of the wider strategic allocations. These were included as part of this potential allocation for further detailed assessment.

As a result 66 sites, which the SHLAA indicated have a capacity for approximately 4,225 dwellings, have been grouped together for detailed consideration as part of 29 potential allocations in the Local Plan.

This Housing Sites Options Paper considers these 29 sites in detail with the aim of determining those to be recommended for inclusion in the Local Plan.

In order for the New Local Plan to be found sound at examination, the policies within it, including site allocations must be fully justified based on robust evidence. The Council has undertaken an extensive process of gathering evidence to ensure that the sites it selects for housing are the most suitable and deliverable. The following evidence has been gathered and used to inform this topic paper:

Sustainability Appraisal of Sites – consultants Place Services have prepared a Sustainability Appraisal of the Local Plan, all sites deemed to be suitable/available through the SHLAA and the 29 proposed allocations, and the findings have informed this paper.

Transport Evidence for the New Local Plan - consultants Mott MacDonald have prepared a Transport Evidence Report for the Local Plan. This report includes modelling the impacts of growth on the transport network, and also assessing the impacts of the sites deemed to be suitable/available through the SHLAA and the 29 proposed allocation on the transport network including specific junctions. The findings of the assessments have informed this paper.

Strategic Flood Risk Assessment Sequential Test – consultants AECOM have prepared a strategic flood risk assessment in relation to those proposed allocations which fall within the relevant flood risk zones. The NPPF requires a sequential test to be carried out in relation to those sites promoted for development in order to

determine the most appropriate locations for development, avoiding those areas at risk of flooding in the first instance. The findings of this test have been used to inform this paper.

Green Belt Topic Paper – consultants Place Services have prepared a Green Belt Review 2018. The purpose assessment was to enable the Council to understand how the Borough's Green Belt land as a whole contributes to the fundamental aims, characteristics and purposes of the Green Belt as set out within NPPF. It adopts an established best practice approach to Green Belt reviews and has evolved from work originally undertaken by Castle Point Borough Council between September 2010 and November 2013. Whilst drawing on previous conclusions as appropriate, this Green Belt Review 2018 supersedes all previous Green Belt Studies or Green Belt Reviews prepared by the Council, and sets out the revised and transparent methodology through which a robust assessment of the Green Belt was undertaken.

As part of the Review the consultants were commissioned to assess the degree of harm on the Green Belt of allocating Green Belt sites that have been put forward for housing through the Call for Sites or have been the subject of previous enquiries. This second report draws upon part 1 of the Green Belt Review 2018 in reaching a conclusion. The findings of this work have been used to inform this paper.

Viability Assessment –consultants Porter Planning Economics have prepared a Viability Assessment for the Borough that has considered the relative viability of specific SHLAA sites, including those which form proposed site allocations, development within different locations of the borough, and on different types of site within Castle Point. The results of this viability assessment have been used to inform this paper.

Information from developers/landowners - Information from the promoters of sites has been used to determine the likelihood of sites being brought forward for development, and whether there is likely to be any additional community benefits associated with a site. This information has been used where available and appropriate to inform this paper.

Assessment of Suitability

The NPPF sets out definitions of deliverable and developable sites within the glossary. For a site to be considered either deliverable or developable, it must be in a suitable location. Therefore, each of the sites being promoted for development has been assessed for suitability. This assessment has looked at four different elements of suitability:

- 1) Sustainability;
- 2) Transport Impacts;
- 3) Flood Risk; and
- 4) Impact on the Green Belt.

This section details how each of the sites has been assessed in terms of these elements of suitability.

1) Sustainability

The NPPF sets out a presumption in favour of sustainable development at paragraph 11. Paragraphs 7 to 10 of the NPPF explain the role of the planning system in achieving sustainable development, and set out an approach to sustainable development that seeks to achieve objectives relating to the economy, society and the environment, setting out that the objectives are interdependent and need to be pursued in a mutually supportive way. It is expected that the pursuit of sustainable development will bring about positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life.

In order for new housing development sites to achieve this balance, it is imperative that the sustainability of sites is assessed, and that such assessment is used to inform the decision making process (this is also a legal requirement). As set out in the introduction of this report, Place Services consultants have undertaken a Sustainability Assessment of the long list of sites.

The method used by Place Services identifies sustainability objectives and themes against which each site has been assessed to identify the potential impacts on the environment, on the community and society and on the economy. Areas of consideration include: Accessibility; Housing; Health, safety and security; Community; Biodiversity; Landscape; Built Environment (inc. Historic); Air Quality; Water Quality; Land Use; and Economy and Employment. A traffic light system has been used to demonstrate how well sites perform against the sustainability objectives, as follows:

Possible Impact	Basis for judgement
++	Strong prospect of there being significant positive impacts
+	Strong prospect of there being minor positive impacts
?	Possibility of either positive or negative impacts, or general uncertainty.
0	No impact
N/A	Not applicable to the scope or context of the appraised content
-	Strong prospect of there being minor negative impacts and mitigation would be possible
--	Strong prospect of there being significant negative impacts with mitigation unlikely to be possible (pending further investigation)

The Scoping Report for the Sustainability Appraisal highlights the fact that a red score should not be considered to be an absolute constraint to development, as many adverse impacts could be mitigated against in order to reduce that impact.

The sustainability assessment of sites does not use any quantified scoring. This was done to avoid using aggregated scores to decide on the most sustainable site. These can be misleading as by presenting a single score it means that potential significant negative effects that could be an absolute constraint on development are averaged out. It also means that some issues get greater weight in the consideration of sustainability. For instance, in the assessment a large number of criteria relate to accessibility and few to biodiversity, which would bias any cumulative score. The traffic light system allows the sites to be compared for their performance against individual criteria or groups of criteria e.g. accessibility.

In order to provide advice on the general sustainability of each site, any recommendation on mitigation have been included in the schedule of this report. A colour coding system has then been used to provide some direction on the relative sustainability of sites. The following explains how this has been applied:

Good Sustainability (Colour Coded Green) – The traffic light system identified a number of criteria scoring green, with some criteria scoring amber. No criteria scored a red. It is considered that the mitigation measures identified by the consultants can reasonably be achieved.

Some Sustainability Issues (Colour Coded Amber) – The traffic light system mainly identifies criteria as scoring green or amber, however there are a few criteria scoring red. It is considered that the mitigation measures identified by the consultants can reasonably be achieved.

Poor Sustainability (Colour Coded Red) – The traffic light system identifies several criteria against which the site scores red. It is considered that the mitigation measures identified by the consultants cannot reasonably be achieved.

2) Transport Impacts

Previous consultation responses clearly revealed that residents were concerned about the traffic impacts associated with new development. The NPPF meanwhile highlights the important role that transport has to play in facilitating sustainable development and also in contributing to wider sustainability and health objectives. The NPPF expects that where developments would generate a significant amount of additional movements, plans should consider whether sustainable transport modes can be taken up to reduce the need for major transport infrastructure, and where improvements are needed to the transport network, they are cost effective.

It should be noted that when taking decisions on the identification of sites for development, the NPPF at paragraph 32, bullet point 3 is clear that developments should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. Therefore, if the Council seeks to reject a potential development site on transport grounds it should be clear that the evidence demonstrates a severe impact, once any potential mitigation has been taken into account.

Given the importance of transport impacts to local residents, and the importance of transport policies to achieving sustainability, specialist consultants URS were appointed to prepare Transport Evidence for the New Local Plan 2014 and 2016. This considered the likely impacts of the different development sites being promoted on the transport network. Traffic counts were undertaken in February 2013, and these were used to build a Spreadsheet Model which also pulled in data from other sources such as the transport modelling work undertaken for Hadleigh and Canvey Town Centres, work undertaken for the Sadlers Farm Junction Improvements, and information included within Transport Statements and Transport Assessment, where appropriate. The spreadsheet model considered the impacts of growth in Castle Point from a worst case scenario perspective i.e. all sites being delivered.

Having undertaken the spreadsheet modelling, it was possible to identify where the capacity of junctions would be challenged or exceeded by new development. URS then undertook junction modelling to determine whether it was technically, and financially feasible to carry out improvements to the junction to accommodate the new development.

In addition to the quantitative and technical assessment, a qualitative assessment of the potential development sites was also undertaken, looking at accessibility issues,

and the potential to promote the use of public transport and active modes of travel, consistent with section 4 of the NPPF which seeks a balance in favour of sustainable transport modes.

Mott MacDonald have undertaken work to support a refresh of the transport evidence base for the Local Plan. The potential rationale for transport impacts moving forward is that where sites being considered in 2018 were included in the 2014 or 2016 plan, conclusions regarding their impacts/suitability remain valid. This largely draws from the fact that there has been very little new development in the Borough since that time, and therefore new modelling may not be required. There may be instances where new development has come forward, or the proposals have changed (greater densities proposed for example) but these would have been accompanied by appropriate transport evidence. The interim conclusions of the evidence refresh have found that the underlying base position in Castle Point from a transport perspective is broadly similar to that appraised for the earlier transport evidence.

In order to provide advice on the general transport impact of each site, the outcomes have been summarised in the schedule within the conclusions of this report. A colour coding system has then been used to provide some direction on the relative impacts of each site in terms of transport. The following explains how this has been applied:

Low Transport Impacts (Colour Coded Green) – The qualitative assessment indicates that the site has good levels of accessibility, and the potential to encourage sustainable transport patterns.

Medium Transport Impacts (Colour Coded Amber) – The qualitative assessment indicates that the site generally has good levels of accessibility and the potential to encourage sustainable transport patterns, although there are some issues where mitigation is required.

High Transport Impacts (Colour Coded Red) – The qualitative assessment indicates that the site has poor levels of accessibility, and will not encourage sustainable transport patterns.

3) Flood Risk Impacts

Paragraph 157 of the NPPF is clear that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Where development is necessary, it should be made safe without increasing flood risk elsewhere. Local Plans should be supported by Strategic Flood Risk Assessment and Local Plans should apply a sequential, risk-based approach to the

location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change. This should be achieved by amongst other things applying the sequential test and if necessary the exception test.

Paragraph 158 of the NPPF details the approach to the sequential test. It is clear that development should not be allocated if there are reasonably available sites appropriate for the proposed development in areas of lower probability of flooding. Paragraph 159 meanwhile details the approach to the exception test. This states that if, following the application of the sequential test, it is not possible, consistent with wider sustainability objectives, for the development to be located in areas of lower probability of the flooding, the exception test can be applied. The exception test should be informed by a strategic or site specific flood risk assessment. For the exception test to be passed:

- the development would provide wider sustainability benefits to the community that outweigh the flood risk; and
- the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

Both the sequential test and the exceptions test have to be passed for a development site to be allocated. Therefore, decisions should pay careful regard to the advice related to flood risk, and where necessary inappropriate development sites that fail the sequential or exceptions test should be eliminated from consideration. Preference should be given to those sites in areas of low flood risk in the first instance.

A sequential test and exception test has been prepared to assess the sites being promoted for inclusion in the New Local Plan for housing development. Throughout this testing consideration was given to the South Essex Level 1 Strategic Flood Risk Assessment 2018, draft Castle Point Level 2 Strategic Flood Risk Assessment (2018) and the South Essex Surface Water Management Plan 2012.

Additionally, the sequential test has been informed by the SHLAA in order to identify reasonably available sites. The exceptions test has meanwhile been informed by the work to prepare the Sustainability Appraisal (2018). This was used to identify whether wider sustainability benefits exist to outweigh flood risk.

The Sequential Test Report ranks the sites according to their potential to be affected by flood risk. Those sites in flood risk zone 1 were ranked higher than those in flood risk zone 3. Intermediate ranking was then used to address issues related to surface water and groundwater flooding, and the potential for such risks to be avoided. A

total of 6 ranking groups were derived, with those ranked in group 1 being preferable, in flood risk terms, compared to those ranked in groups 2 through to 6. In order to provide advice on the general flood risk impacts, and associated appropriateness of each site, the outcomes of the Sequential and Exception Test have been summarised in the schedule in the conclusions of this report. A colour coding system has then been used to provide some direction on the relative impacts of each site in terms of flood risk. The following explains how this has been applied:

Low Flood Risk Impacts (Colour Coded Green) – The site is in flood risk zone 1, and is included within ranking group 1 or ranking group 2.

Medium Flood Risk Impacts (Colour Coded Amber) – The site included within rankings groups 3 or 4 within the Sequential Test Report indicating that they are within flood risk zone 1 but that there are some issues with surface water or groundwater flood risk that will need to be mitigated.

High Flood Risk Impacts (Colour Coded Red) – The site is within flood risk zone 3, and may or may not pass the sequential test (ranking groups 5 and 6).

4) Green Belt Impacts

Previous consultation responses revealed that residents favoured a green environment and the ongoing protection of the Green Belt. Paragraph 133 of the NPPF states that the Government attaches great importance to Green Belt. It reiterates the fundamental aim of the Green Belt as being to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Green Belt serves five purposes. These are:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other land.

Once defined, local planning authorities should plan for positive enhancements to the Green Belt including the retention and enhancement of the landscape and visual amenity.

Green Belt boundaries should only be altered exceptionally, and through the preparation of the Local Plan. In doing so, sustainable patterns of development should be encouraged and sufficient land should be made available to meet the

requirements for sustainable development. Additionally, land should be safeguarded to meet longer term needs for development extending beyond the plan period. In reviewing Green Belt boundaries, the extent of the green belt should be clearly defined using physical features that are readily recognisable and likely to be permanent. The NPPF, therefore expects local planning authorities to review their Green Belts to meet the needs of sustainable development. However, given the importance attached to the ongoing protection of the Green Belt, it is clear that protection can be afforded to those areas of the Green Belt that fulfil the purposes and have landscape and aesthetic value.

This balance should be considered as part of the decision making process. The Green Belt Review 2018 has been prepared to aid in the plan-making process. It assesses the contribution different parts of the Green Belt in Castle Point make to the five purposes. The Review identified parcels which constitute four locally strategic areas of Green Belt in Castle Point and also parcels which are not part of these strategic areas.

The second part of the Green Belt Review 2018 assess the degree of harm to the Green Belt, on a site-by-site basis, of allocating individual Green Belt sites that have been put forward for housing. These sites have been suggested to the Council as part of the Call for Sites, or have been the subject of previous enquiries. Should it be considered appropriate to allocate these sites for housing through the Local Plan, it would necessitate the removal of the Green Belt designation as part of a strategic release of Green Belt carried out as part of the formation of the same plan. The assessments carried out through the Review consider the impact that the release and subsequent development of the proposed sites would have on the established purposes of the Green Belt as they pertain to the immediate site and locality. The assessments also cover any impact on the wider Green Belt, the consideration of alternative boundaries to those proposed by the site that may allow for the formation of more defensible Green Belt boundaries which could endure in the long term, and potential options for the mitigation of harm should the site be removed from the Green Belt.

As recommended by the Green Belt Review 2018, an assessment of exceptional circumstances which may exist to justify changes to the Green Belt has been considered through the Green Belt Topic Paper 2018. The Green Belt Topic Paper 2018 establishes that such exceptional circumstances exist, demonstrates that the Council has fully examined all other reasonable options for meeting its identified need for development and identifies the existence and/or level of harm to the strategic function of the Green Belt.

This Housing Site Options Topic Paper presents the likely impact of the development of each site on the Green Belt alongside other relevant impacts such as transport,

sustainability appraisal, flood risk etc and concludes whether it could reasonably be brought forward for development.

A colour coding system has then been used to provide some direction on the relative impacts of each site in terms of Green Belt as drawn from the Green Belt Review 2018. The following explains how this has been applied:

Low Green Belt Impacts (Colour Coded Green) – The site could be removed from the Green Belt with minimal impact on the openness or strategic function of the Green Belt. The revised Green Belt boundary/s would be recognisable and most likely permanent.

Medium Green Belt Impacts (Colour Coded Amber) – The site could be removed from the Green Belt with limited impact on the strategic function of the Green Belt. However, in order to reduce the impact of development on the character and openness of the wider area, landscaping features need to be retained and as appropriate enhanced to achieve better integration of the development into the existing landscape.

High Green Belt Impacts (Colour Coded Red) – The site cannot be removed from the Green Belt without causing harm to the strategic function of the Green Belt, and the impact on the openness and character of the Green Belt would be significant and probably beyond mitigation.

Assessment of Deliverability

The NPPF sets out definitions of deliverable and developable sites within the Glossary in Annex 2. To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged. It is therefore clear from these definitions that consideration needs to be given to the viability and availability of each development site in order to determine whether there is a realistic prospect of a site being delivered.

Viability

NPPF requires that viability of development must be established through the Local Plan making process (paragraph 67). The Planning Practice Guidance confirms that Local Plans must set out the contributions to infrastructure (such as schools, transport, health etc) and affordable housing that are expected from development.

The role for viability assessment is primarily at the plan making stage, it should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.

In order to ensure that the proposals in the New Local Plan are viable, and therefore deliverable, the Council appointed consultants Porter Planning Economics to undertake a Viability Assessment for the Local Plan. This assessment is based on the NPPF and Planning Practice Guidance, and uses a residual land value plus premium approach. Work has been undertaken to assess the local housing market and understand the local values and costs associated with development in Castle Point.

This assessment has identified the impact that affordable housing provision and infrastructure requirements has on viability. It has built in costs regularly incurred by developers in meeting flood risk and ecology requirements of policies. Additionally, where a particular site is likely to incur a significant infrastructure cost in order to be delivered this has also been identified. The viability assessment has identified the relative viability of different locations and types of development within Castle Point. The full outcomes of this work can be found in the separate Local Plan Development Viability Assessment.

This Housing Site Options Topic Paper presents the likely viability of development at each proposed site alongside other relevant impacts such as greenbelt, transport, sustainability appraisal, flood risk etc and concludes whether it could reasonably be brought forward for development.

A colour coding system has then been used to provide some direction on the relative viability of each site as drawn from the Development Viability Assessment 2018 but has been supplemented by information provided by developers and landowners. The following explains how this has been applied:

Good Viability (Colour Coded Green) – The site is in a high value area. It is likely that the site can be delivered comfortably in accordance with policies on affordable housing.

Possible Viability Issues (Colour Coded Amber) – The site is in a low value area, or has infrastructure requirements which reduce the degree of comfort the site has in terms of being delivered in accordance with policies on affordable housing. Significant changes in the local market or significant unexpected costs may make the site unviable.

Poor Viability (Colour Coded Red) – The site cannot be delivered in accordance with policies on affordable housing without making it unviable.

Availability

Availability for development is intrinsically linked to the progress a site has made through the development control process. It is also linked to landownership arrangements. Where a housebuilding company has options, or owns a site is more likely to be available sooner than a site being promoted by a landowner with no house builder interest. Sites in multiple ownership with no house builder involvement, are likely to take many years to come forward and have the least prospect of being delivered in the short to medium term.

The progress of the sites promoted for inclusion in the New Local Plan through the development control process has been reviewed, and information on land ownership monitored. This is reported in the SHLAA, which can be viewed separately.

A colour coding system has then been used to provide some direction on the relative availability of each site based on the SHLAA and any further evidence available during the preparation of the Plan. The following explains how this has been applied:

Good Availability (Colour Coded Green) – The site has planning permission, a planning application has been submitted for the site, or a landowner/house builder is involved in promoting the site and has engaged with the Council regularly and/or recently to promote the site.

Reasonable prospect that the site is available (Colour Coded Amber) – The landowner has not engaged with the Council regularly/or recently to promote the site and/or there is no house builder involvement.

Availability Uncertain (Colour Coded Red) Owner interest is known to the Council, but work to bring the site forward has not progressed - the site is in multiple ownership and there is no evidence of a legal agreement to promote comprehensive development.

Where the availability of a site is uncertain it is not recommended for inclusion in the New Local Plan, especially in the short to medium term. The New Local Plan will be subject to public examination of its soundness. This includes a test of effectiveness i.e. whether the plan can be delivered over its period. A plan reliant on sites where their availability is uncertain will most likely be found unsound against this test and such sites should therefore be avoided.

Assessment of Additionality

When considering each of the sites below, the main contribution each site would make to sustainable development is the provision of new homes to meet objectively assessed housing need. However, development proposals can bring about additional benefits which benefit the local economy, the environment and the local community. Such benefits can act to enhance the sustainability of development by achieving better integration of the economic, social and environmental roles of planning consistent with paragraphs 6 to 10 of the NPPF.

It is necessary to consider the additional benefits that may arise from each of the development sites proposed when identifying housing site options for the New Local Plan. Such additional benefits have been identified through information provided by developers through planning applications, or discussions. Where no developer is present, officers have considered the potential and likely contribution a site could make in terms of additional benefits. This information is presented in the schedule in the conclusions of this report. A colour coding system has been used to provide some direction on the relative additionality provided by each site. The following explains how this has been applied:

Clear additionality (colour coded Green) – the site owners / developers have clearly indicated additional benefits to be provided by the site.

Potential additionality (colour coded Amber) – officers have identified the potential for additional benefits to be secured on the site, however there is no landowner commitment to such benefits.

Unlikely to be additionality (colour coded Red) – due to the size and scale of the site officer have been unable to identify the potential for additional benefits to be secured on the site.

Conclusions

In considering sites for inclusion in the Local Plan following has been considered:

- Particular regard has been had to deliverability. Sites proposed to be allocated are available in the short to medium term to enable the Council to demonstrate that its plan is effective and therefore sound.
- Having regard to the NPPF, reasonably available sites in areas at lower risk of flooding in preference to sites in areas at higher risk of flooding in the first instance. Sites which do not pass the exception test should be avoided.
- In terms of suitability, it should be recognised that negative impacts of development can normally be mitigated so that harm is minimised. However, sites where there are negative outcomes across a number of areas should normally be avoided.
- Consideration should be given to additionality, as this may result in wider sustainability objectives being achieved consistent with the NPPF.

Site	Capacity	Suitability				Deliverability		Additionality	Mitigation
		Sustainability	Transport Impacts	Flood Risk Impacts	Green Belt Impacts	Viability	Availability		
Land west of Benfleet	940	G	A	G	G	G	A	<p>Part of the site is adjacent to Council owned public open space and allotments. There is potential to seek improvements to these as part of the development.</p> <p>There is potential to deliver new transport infrastructure providing an additional access from the A130 Canvey Way into the west of Benfleet.</p> <p>The developer has introduced proposals for new open space provision, new habitat creation and new footpath provision in association with the proposed development.</p>	The introduction of landscaping and mature trees would help create the perception that this part of the A130 is cutting across a rural area but the full visual impact would be hard to mitigate due to the landform. Development would require a substantial belt of vegetation to be created or retained along the A130 to create a rural character on the approach to Canvey Island.
Land between Felstead Road and Catherine Road	183	G	G	G	G	G	A	If allocated through the Local Plan, additionality will be discussed with the developer at the planning application stage.	The proposed housing site contains a significant number of mature trees, some of which could be retained and incorporated into sympathetic landscaping to ensure that development is well screened.
Land off the Glyders	30	A	G	G	A	G	G	As a small site, it is unlikely to realise any specific/significant wider benefits.	<p>Reconfiguring the development site up to the point where the eastern boundary runs directly north to south, thereby omitting the easterly protrusion, would however create a pattern of development more akin to residential infill whilst removing the element considered to constitute ribbon development and encroachment into the countryside.</p> <p>Part of the northern boundary and the entirety of the eastern boundary of the proposed development site would be adjacent to Green Belt land so a landscaped boundary would be required</p>

Site	Capacity	Suitability				Deliverability		Additionality	Mitigation
		Sustainability	Transport Impacts	Flood Risk Impacts	Green Belt Impacts	Viability	Availability		
									<p>to minimise the visual impact on the rural area beyond. Due to the topography, any new properties that may be built along Essex Way, like those which exist, would be visible from Vicarage Hall which is also in the Green Belt and are unlikely to be able to be screened.</p> <p>The Interim Sustainability Appraisal has identified that the allocation policy must mitigate impacts on the adjacent public Right of Way.</p>
Former WRVS Hall, Richmond Avenue	39	G	G	R	N/A	G	G	As a small site, it is unlikely to realise any specific/significant wider benefits.	<p>The site lies mainly in defended Flood Zone 3 associated with the tidal Thames estuary, and is at residual risk of tidal flooding in the event of a breach in flood defences. The site is also at risk of fluvial flooding from the main river along the western edge of the site and is identified to be at risk of surface water flooding. Fluvial modelling will be required to further understand the extent of fluvial risk to the site. To mitigate the risk of flooding more vulnerable uses should be preferentially located away from areas within the 1% AEP flood extent (1 in 100 year) for the main river including an allowance for climate change. Residential uses will be accommodated for on the first floor or above with less vulnerable uses located on the ground floor level.</p>
Land at Kents Hill Road	35	A	G	G	N/A	G	G	As a small site, it is unlikely to realise any specific/significant wider benefits.	<p>The Interim Sustainability has identified potential capacity issues with the nearby road network. The Transport Assessment has not identified any strategic issues but the allocation policy should seek to reflect points of detail to ensure safety and accessibility.</p>
Land east of Rayleigh Road	455	G	G	G	R	G	G	<p>Developers have indicated that they could bring forward:</p> <ul style="list-style-type: none"> Alternative route between Rayleigh Road and Daws Heath Road by-passing Woodman Arms junction and nearby secondary school. Significant area of managed parkland Greenways linking site with nearby woodland and open spaces A community learning facility 	<p>Opportunities should be explored in terms of the configuration of the site in order to limit the propagation of ribbon development along Daws Heath Road.</p> <p>The development site is currently open countryside and has particular significance to the Green Belt purpose of preventing urban coalescence and so therefore any development would need to be well screened.</p>
Land at Brook Farm	173	G	A	G	R	G	G	Developers/Landowners have indicated that they could bring forward a proposal which includes the creation of new habitat areas towards the east of the site.	<p>The proposed development site could be realigned along the unsurfaced road such that the land incorporating Brooks Farm is not included. This wouldn't represent a significantly more robust boundary than what is currently proposed but would importantly omit most of the land in proximity to Daws Heath Road from potential development</p>

Site	Capacity	Suitability				Deliverability		Additionality	Mitigation
		Sustainability	Transport Impacts	Flood Risk Impacts	Green Belt Impacts	Viability	Availability		
									<p>which would cause the merging of Hadleigh and Daws Heath.</p> <p>Development within this site will be required to be well screened along the southern edge such that it doesn't significantly contribute to the perception of Daws Heath merging with Hadleigh.</p>
Land south of Scrub Lane	55	A	G	G	N/A	G	G	If allocated through the Local Plan, additionality will be discussed with the developer at the planning application stage.	The Interim Sustainability has identified that highway capacity issues are unknown. However, the Transport Assessment has not identified any strategic issues. The allocation policy should seek to reflect points of detail to ensure safety and accessibility.
Land at Oak Tree Farm	65	G	A	G	R	G	G	Developers have indicated that they could bring forward a new area of managed open space as part of the development.	The well-developed screening along the northern, eastern and southern edge should be retained.
Land north of Scrub Lane	15	G	A	G	N/A	G	G	As a small site, it is unlikely to realise any specific/significant wider benefits.	The Transport Assessment has not identified any strategic issues. The allocation policy should seek to reflect points of detail to ensure safety and accessibility. Furthermore, this site is unlikely to require significant or specific mitigation measures beyond issues expected to be covered by policies within the Local Plan.
Land at Park Chase	21	G	G	G	N/A	G	G	As a small site, it is unlikely to realise any specific/significant wider benefits.	Technical evidence suggests that this site is unlikely to require significant or specific mitigation measures beyond issues expected to be covered by policies within the Local Plan.
Hadleigh Island Site	52	G	G	G	N/A	G	A	If allocated through the Local Plan, additionality will be discussed with the developer at the planning application stage.	Technical evidence suggests that this site is unlikely to require significant or specific mitigation measures beyond issues expected to be covered by policies within the Local Plan.
Land east of Downer Road North	20	A	A	A	A	G	A	As a small site, it is unlikely to realise any specific/significant wider benefits.	<p>Should this site be released for development, consideration should be given to maintaining the tree line along Church Road and thus avoiding an almost unbroken frontage of built development between South Benfleet and Thundersley. Further trees could be retained along the eastern boundary to screen what would become the new easterly extent of South Benfleet.</p> <p>The Interim Sustainability Appraisal has identified that the allocation policy must mitigate impacts on the adjacent Bridleway and Coombe Wood Local Wildlife Site. An assessment of impacts on the LoWS site is likely to be required.</p> <p>A small area on the northern periphery of the site is at risk of groundwater flooding. Development should ensure that sufficient drainage improvements and SUDS are implemented,</p>

Site	Capacity	Suitability				Deliverability		Additionality	Mitigation
		Sustainability	Transport Impacts	Flood Risk Impacts	Green Belt Impacts	Viability	Availability		
									properties should also be designed to be resistant and resilient to ground water flooding.
Land at Glebelands	155	G	A	A	G	G	G	Developers have indicated that they could bring forward a new area of managed open space and new habitat management areas.	<p>The introduction of landscaping and the establishing of mature trees would reduce the perception that this part of the A130 is cutting across a rural area.</p> <p>The risk of flooding on this site should be managed through SUDS and appropriate drainage improvements. Properties should also be designed to be flood resistant, resilient with no basement dwellings being permitted.</p>
East of Manor Trading Estate & rear of Robert Drake School	95	A	A	G	A	G	G	Developers have indicated that access can be secured form Church Road.	<p>Any development within this parcel should be well screened from the proximal road network to preserve the rural feel of what largely functions as a small rural break in between the industrial estate and surrounding residential dwellings.</p> <p>The Interim Sustainability Appraisal has identified that the allocation policy must mitigate impacts on the adjacent Bridleway.</p>
The Chase	350	G	G	G	A	G	A	There is the potential to secure additional open space and greenway connections on this site. Habitat management can also be achieved, resulting in benefits to biodiversity.	The harm arising from this development proposal could be managed through the appropriate design and layout of development on the site, accompanied by the use of strong landscaped boundaries. Much of the site boundary and land within the site already benefits from mature trees which could be retained.
Land at Weir House	12	G	G	G	N/A	G	G	As a small site, it is unlikely to realise any specific/significant wider benefits.	Technical evidence suggests that this site is unlikely to require significant or specific mitigation measures beyond issues expected to be covered by policies within the Local Plan.
Land fronting Rayleigh Road	60	G	G	G	N/A	G	A	If allocated through the Local Plan, additionality will be discussed with the developer at the planning application stage.	Technical evidence suggests that this site is unlikely to require significant or specific mitigation measures beyond issues expected to be covered by policies within the Local Plan.
Land at Thames Loose Leaf	12	A	G	G	N/A	G	A	As a small site, it is unlikely to realise any specific/significant wider benefits.	The Interim Sustainability Appraisal has identified that this land has been in use for employment purposes, and its loss may not be sustainable. However, evidence from the EDNA identifies that employment needs of the Borough are limited, and these are being met on sites allocated through the Local Plan
Land east of Canvey Road	300	G	A	R	R	G	G	<p>Developers have indicated that they could bring forward proposals to include:</p> <ul style="list-style-type: none"> Managed open space Land for community use 	The boundaries of the site would need to be effectively landscaped where they are immediately adjacent to rural Green Belt. The proposed site boundary extends north away from the existing

Site	Capacity	Suitability				Deliverability		Additionality	Mitigation
		Sustainability	Transport Impacts	Flood Risk Impacts	Green Belt Impacts	Viability	Availability		
								<ul style="list-style-type: none"> Greenway between existing urban area and RSPB West Canvey Marshes. Greenway between existing urban area and Waterside Farm Management of archaeology 	<p>built up area. Whilst there are no robust boundary features to act as alternative boundaries, it is considered that the extent of residential development should be limited in order to reduce the harm to the green belt. Therefore the site boundary should be re-aligned from the northern extent of the wooded area to the north of the Dutch Village across to the rear of the school. This would result in a development site which more closely reflects the existing settlement pattern and act to reduce harm to the Green Belt to the north.</p> <p>This site is considered to fulfil sustainability criteria; in relation to flood risk, after engagement with the Emergency Planning Team this site is considered to pass the Exceptions Test in regards to flooding. Effective surface water management measures must be implemented, including careful site and building layout and the incorporation of SuDS, in order to reduce flooding both on the site and routing of flood water to other areas. A Flood Warning and Evacuation Plan (FWEP) must be prepared for the site in consultation with the Emergency Planning Team and Castle Point Borough Council, detailing how flood warning will be provided as well as how the safety of occupants and access to/from the development will be ensured.</p>
Land west of Canvey Road (The Triangle)	253	G	A	R	G	G	A	<p>The site is large and although no firm additional benefits have been proposed by the developer/landowner, it is considered likely that proposals to include:</p> <ul style="list-style-type: none"> Managed open space Land for community use Greenway between existing urban area and RSPB West Canvey Marshes. provision of a residential care home will provide jobs requiring NVQ Level 3 + qualifications in an area where there is notable levels of employment and income deprivation. 	<p>Screening will need to be considered along the boundary with Roscommon Way such that a sympathetic edge is created between the proposed development and wider countryside.</p> <p>This site is considered to fulfil sustainability criteria; in relation to flood risk, after engagement with the Emergency Planning Team this site is considered to pass the Exceptions Test. Effective surface water management measures must be implemented, including careful site and building layout and the incorporation of SuDS, in order to reduce flooding both on the site and routing of flood water to other areas. A Flood Warning and Evacuation Plan (FWEP) must be prepared for the site in consultation with the Emergency Planning Team and Castle Point Borough Council, detailing how flood warning will be provided as well as how the safety of occupants and access to/from the development will be ensured.</p>

Site	Capacity	Suitability				Deliverability		Additionality	Mitigation
		Sustainability	Transport Impacts	Flood Risk Impacts	Green Belt Impacts	Viability	Availability		
Land at Thorney Bay	600	G	A	R	N/A	G	G	<p>Developers have indicated that the site could provide:</p> <ul style="list-style-type: none"> • A reserved route for Roscommon Way Phase 3 • A zone protected for future coastal defence works • A residential care home • The provision of open space 	<p>The site has satisfactory access to an existing highway. It also has reasonable proximity to local services and facilities, pedestrian and cycle routes and the bus network.</p> <p>Effective surface water management measures must be implemented, including careful site and building layout and the incorporation of SuDS, in order to reduce flooding both on the site and routing of flood water to other areas. Floor levels should be set to the higher of 300mm above the modelled flood level for the fluvial watercourses adjacent to the site, or 600mm above the modelled floor level for the 0.5% AEP (1 in 200 year) breach event. Less vulnerable uses should be located at ground level. A Flood Warning and Evacuation Plan (FWEP) must be prepared for the site in consultation with the Emergency Planning Team and Castle Point Borough Council, detailing how flood warning will be provided as well as how the safety of occupants and access to/from the development will be ensured.</p>
Land at The Point	100	A	G	R	N/A	G	G	<p>If allocated through the Local Plan, additionality will be discussed with the developer at the planning application stage.</p>	<p>The Interim Sustainability Appraisal has identified that the allocation policy must mitigate impacts on the adjacent Public Right of Way.</p> <p>Effective surface water management measures must be implemented, including careful site and building layout and the incorporation of SuDS, in order to reduce flooding both on the site and routing of flood water to other areas. Floor levels should be set above 600mm above the modelled floor level for the 0.5% AEP (1 in 200 year) breach event, with less vulnerable uses located at ground level. A Flood Warning and Evacuation Plan (FWEP) must be prepared for the site in consultation with the Emergency Planning Team and Castle Point Borough Council, detailing how flood warning will be provided as well as how the safety of occupants and access to/from the development will be ensured.</p>
Walsingham House	32	G	G	R	N/A	G	G	<p>As a small site, it is unlikely to realise any specific/significant wider benefits.</p>	<p>Effective surface water management measures must be implemented, including careful site and building layout and the incorporation of SuDS, in order to reduce flooding both on the site and routing of flood water to other areas. Floor levels</p>

Site	Capacity	Suitability				Deliverability		Additionality	Mitigation
		Sustainability	Transport Impacts	Flood Risk Impacts	Green Belt Impacts	Viability	Availability		
									should be set above 600mm above the modelled floor level for the 0.5% AEP (1 in 200 year) breach event, with less vulnerable uses located at ground level. A Flood Warning and Evacuation Plan (FWEP) must be prepared for the site in consultation with the Emergency Planning Team and Castle Point Borough Council, detailing how flood warning will be provided as well as how the safety of occupants and access to/from the development will be ensured.
Admiral Jellicoe	40	G	G	R	N/A	G	G	As a small site, it is unlikely to realise any specific/significant wider benefits.	Effective surface water management measures must be implemented, including careful site and building layout and the incorporation of SuDS, in order to reduce flooding both on the site and routing of flood water to other areas. Floor levels should be set above 600mm above the modelled floor level for the 0.5% AEP (1 in 200 year) breach event, with less vulnerable uses located at ground level. A Flood Warning and Evacuation Plan (FWEP) must be prepared for the site in consultation with the Emergency Planning Team and Castle Point Borough Council, detailing how flood warning will be provided as well as how the safety of occupants and access to/from the development will be ensured.
Land south of Haron Close	10	A	G	R	N/A	G	G	As a small site, it is unlikely to realise any specific/significant wider benefits.	Effective surface water management measures must be implemented, including careful site and building layout and the incorporation of SuDS, in order to reduce flooding both on the site and routing of flood water to other areas. Floor levels should be set above 600mm above the modelled floor level for the 0.5% AEP (1 in 200 year) breach event, with less vulnerable uses located at ground level. A Flood Warning and Evacuation Plan (FWEP) must be prepared for the site in consultation with the Emergency Planning Team and Castle Point Borough Council, detailing how flood warning will be provided as well as how the safety of occupants and access to/from the development will be ensured.
Haystack car park	14	A	G	R	N/A	G	G	As a small site, it is unlikely to realise any specific/significant wider benefits.	Effective surface water management measures must be implemented, including careful site and building layout and the incorporation of SuDS, in order to reduce flooding both on the site and routing of flood water to other areas. Floor levels should be set above 600mm above the modelled floor level for the 0.5% AEP (1 in 200 year) breach

Site	Capacity	Suitability				Deliverability		Additionality	Mitigation
		Sustainability	Transport Impacts	Flood Risk Impacts	Green Belt Impacts	Viability	Availability		
									event, with less vulnerable uses located at ground level. A Flood Warning and Evacuation Plan (FWEP) must be prepared for the site in consultation with the Emergency Planning Team and Castle Point Borough Council, detailing how flood warning will be provided as well as how the safety of occupants and access to/from the development will be ensured.
Land adjacent to Solby Wood Farm, Daws Heath	46	G	A	G	R	G	G	The site is relatively small, but it is likely to be possible linkages to open space and a footpath linking West Wood with Daws Heath Road to the east, brought forward through the adjacent site.	Any development should incorporate screening to the south and west. Effective boundary treatment would be particularly important to the south to preserve the perception of a rural gap between Hadleigh and Daws Heath.
Kings Park, Canvey	50	G	A	R	G	G	G	If allocated through the Local Plan, additionality will be discussed with the developer at the planning application stage.	<p>Boundary treatments should aim to provide a sympathetic edge with the inter-tidal habitat to the north and the nature reserve which would remain in the Green Belt to the east. The topography to the immediate east means that development should be limited to two storey dwellings in keeping with the neighbouring development.</p> <p>Effective surface water management measures must be implemented, including careful site and building layout and the incorporation of SuDS, in order to reduce flooding both on the site and routing of flood water to other areas. Floor levels should be set to the higher of 300mm above the modelled flood level for the fluvial watercourses adjacent to the site, or 600mm above the modelled floor level for the 0.5% AEP (1 in 200 year) breach event. Less vulnerable uses should be located at ground level. A Flood Warning and Evacuation Plan (FWEP) must be prepared for the site in consultation with the Emergency Planning Team and Castle Point Borough Council, detailing how flood warning will be provided as well as how the safety of occupants and access to/from the development will be ensured.</p>

Recommendations

In considering the 29 potential site allocations, a full range of technical evidence has been brought together with the benefits to be gained by the developments. Opportunities for mitigation offered by the technical evidence has also been identified and considered.

It is recommended that all 29 potential sites allocations be taken forward in the draft Local Plan by the Council to meet the sustainable development needs of the Borough. It is recommended that where mitigation measures have been identified, these are included within the site allocation policies.

Appendix 1- Site included on Brownfield Land Register

Table 1: Sites included on the Brownfield Land Register

SHLAA Reference	Site Name	Indicative capacity
S0001	316 London Road, Benfleet	14
S0011	84 Vicarage Hill, Benfleet	2
S0012	240-244 High Road, Benfleet	19
S0014	87-97 High Street, Benfleet	14
S0019	65 Thundersley Park Road, 1 & 1a Clarence Road, Benfleet	1
S0028	125-127 High Street, Canvey Island	14
S0036	Briar Cottage, Leige Avenue, Canvey Island	11
S0046	109 Long Road, Canvey Island	7
S0048	Site Adjacent to Pauls Court, Meppel Avenue, Canvey Island	5
S0052	Tower Radio, 573-581 London Road, Hadleigh	14
S0059	82 High Street, Hadleigh	6
S0060	231 London Road, Hadleigh	6
S0063	88 High Street, Hadleigh	5
S0091	Beaver Doors, 211-213 London Road, Thundersley	10
S0095	Rear of 179-181 Church Road, Thundersley	40
S0099	Benfleet Police Station, 90-92 High Road, Benfleet	13
S0108	Outpatients centre, Long Road, Canvey Island	10
S0118	West of Venebles Close, Canvey Island	34
S0120	Job Centre, 140 Furtherwick Road, Canvey Island	15
S0139	20 Haresland Close, Hadleigh	9
S0165	Valee Casa, 62 Hill Road, Benfleet	5
S0173	Benfleet Tavern Public House (formerly Appleton Arms), High Road, Benfleet	14
S0232	343 Rayleigh Road, Thundersley	10
S0247	166-168 Kiln Road, Benfleet	3
S0249	320 London Road, Hadleigh	20
S0251	High Road, Tarpots Town Centre, Benfleet	17
S0252	286 London Road, Benfleet	5
S0253	Maharaja Restaurant, 358 London Road, Benfleet	6
S0399	61-69 Hart Road, Thundersley	2
S0403	210 & 212 High Road, Benfleet	5
S0406	191-193 High Road, Benfleet	14
S0423	30-32 Essex Way, Benfleet	14
S0426	Stafford Court Care Home, Venables Close, Canvey Island	0
S0436	364 London Road, Hadleigh	9
S0437	54 Beech Road, Hadleigh	14
S0445	246-250 High Road, Benfleet	11

Appendix 2 – Sites not recommended to go forward through the Local Plan

Table 2: Sites suitable for development subject to criteria based policies within the Local Plan

SHLAA Reference	Site Name	Indicative capacity
S0015	74 Essex Way, Benfleet	1
S0020	71 Watlington Road, Benfleet	2
S0023	Land between 117 & 123 Lionel Road, Canvey Island	2
S0037	Land adjacent Briars Cottage, Leige Avenue, Canvey Island	4
S0038	King Canute PH & Land Adjacent Canvey Road, Canvey Island	4
S0039	29 Denham Road, Canvey Island	2
S0040	34 Gafzelle Drive, Canvey Island	1
S0041	1 Northfalls Road, Canvey Island	1
S0042	7 Kollum Road, Canvey	1
S0044	Land adj 64 Winterswyk Avenue, Canvey Island	1
S0045	58 Central Wall Road, Canvey Island	1
S0055	14 St Marks Road, Hadleigh	2
S0056	643-645 London Road, Hadleigh	2
S0058	121 Church Road, Hadleigh	1
S0072	450 Rayleigh Road, Benfleet	2
S0081	Land at rear of 219 Kiln Road, Thundersley	5
S0085	50 Albert Road, Thundersley	1
S0089	14 Downer Road North, Thundersley	1
S0132	Garden Centre, 555 London Road, Hadleigh	6
S0133	Hadleigh Police Station, Hadleigh	2
S0143	116 Rayleigh Road, Hadleigh	4
S0159	6 Merton Road, Benfleet	4
S0168	188 Thundersley Park Road, Benfleet	1
S0179	174 Waarden Road, Canvey Island	2
S0186	34 Beck Road, Canvey Island	1
S0189	29 St. Annes Road, Canvey Island	1
S0192	Land north 42 Zelham Drive, Canvey Island	1
S0199	84 Westerland Avenue, Canvey Island	1
S0202	2-6 May Avenue, Canvey Island	1
S0211	25 Florence Road, Canvey Island	1
S0213	Land to rear of 29-51 St Agnes Drive, Canvey Island	1
S0214	Land between 12 & 14 St Johns Crescent, Canvey Island	2
S0215	Land to rear of 12-18 St Peters Road, Canvey Island	4
S0216	Land to rear of 3-15 St Davids Walk, Canvey Island	4
S0217	Land to rear of 25-37 St Marks Road, Canvey Island	1
S0219	Cheriton, Stroma Avenue, Canvey Island	10
S0240	45 Manor Road, Thundersley	1
S0259	19 Romsey Road, Benfleet	1
S0272	254 Kiln Road, Benfleet	1
S0278	66 Wavertree Road, Benfleet	1
S0339	73 Daws Heath Road, Hadleigh	1
S0349	68 The Chase, Thundersley	1
S0358	64 Kenneth Road, Thundersley	1

SHLAA Reference	Site Name	Indicative capacity
S0363	1 Langford Crescent & r/o 27 & 29 Raymonds Drive, Thundersley	1
S0371	Land to rear of 187-209 Link Road, Canvey Island	3
S0372	Land between 43 & 45 Benderloch, Canvey Island	2
S0373	Land r/o 56-80 North Avenue, Canvey Island	10
S0374	Land adjacent 2 Cedar Road, Canvey Island	1
S0375	Land between 20 & 26 Marine Avenue, Canvey Island	1
S0376	Land between 64 & 68 Kingsmere, Hadleigh	4
S0377	Land between 12 & 14 Merrivale, Benfleet	1
S0378	Land between 37 & 45 Merrivale, Benfleet	2
S0379	Land between 14 & 16 Tilburg Road, Canvey Island	1
S0380	Land adj 31 St Christopher's Close, Canvey Island	3
S0381	Land adj 24 Windsor Gardens, Hadleigh	2
S0382	Land adj 38 Maple Way, Canvey Island	1
S0383	Land opposite 77-83 Maple Way, Canvey Island	2
S0384	Land adj 16 Pine Close, Canvey Island	2
S0385	Land adj 13 Linden Way, Canvey Island	1
S0386	Land adj 15 Little Gypps Road, Canvey Island	1
S0387	Land adj 21 Cherry Close, Canvey Island	1
S0388	Land adj 32 Linden Way, Canvey Island	1
S0389	Land between 18 & 20 Little Gypps Road, Canvey Island	1
S0390	173 Eastern Esplanade, Canvey Island	2
S0391	Land between Shell Beach Road, Margareten Avenue & Eastern Esplanade, Canvey Island	4
S0396	160 Clifton Avenue, Benfleet	1
S0419	27 - 29 Geylen Road, Canvey Island	2
S0424	59 South View Road, Benfleet	3
S0438	Land adjacent 573 High Road, Benfleet	1
S0444	Land adjacent 14 Thundersley Park Road, Benfleet	1
S0064	2A Castle Road, Hadleigh	1
S0065	80 High Street, Hadleigh	3
S0088	R/o 122 Stanley Road, Thundersley	3
S0107	Lake Link Block Waarden Road / Furtherwick Road / Knightswick Road, Canvey Island	4

Table 3: Sites removed from further consideration

SHLAA Reference	Site Name	Capacity	Justification
S0013	Land between 24-34 Crescent Road, Benfleet	3	Site already has planning permission and has been built out. Numbers cannot contribute to Local Plan housing numbers.
S0069	Nashlea Farm, Poors Lane North, Hadleigh	6	Site already has planning permission. However, this site is in the middle of the greenbelt and is

SHLAA Reference	Site Name	Capacity	Justification
			not contiguous with the urban fringe such that it would likely represent unsustainable development.
S0074	Junction of Grasmere Road & Thirlmere Road, Thundersley	4	Site would create a gap within the greenbelt. There is an issue with clustering sites S0074, S0152, S0153, S0405 and S0146 as there are multiple landowners. S0146 was deemed not suitable through the SHLAA process. That site largely connects all of the sites together and therefore all would not be appropriate for development as various gaps would be produced in the greenbelt.
S0087	Whitegate, Goldfinch Lane, Thundersley	5	This site lies close to the Great Common SSSI. If this site was developed it would isolate a piece of greenbelt land next to an SSSI where development is unlikely to occur.
S0100	Wheelers Takeaway, 458 London Road, Benfleet	14	This site sits in the middle of the greenbelt and not on the urban fringe. Releasing this together with and the land between Felstead Road and Catherine Road would create a small gap in the greenbelt. If all of these sites were released this would likely impact the areas openness, especially as the opposite side of the road is a wooded area similar to this. Due to the small scale of this site it is not taken forward.
S0130	Hadleigh Junior School, Church Road, Hadleigh	22	Previously was considered through the SHLAA, but recent evidence confirms that the site is now unavailable.

SHLAA Reference	Site Name	Capacity	Justification
S0137	Land south of Daws Heath Road, Hadleigh	90	This site is in the middle of the greenbelt and is not contiguous with the urban fringe such that it would likely represent unsustainable development.
S0140	Land east of 174 Bramble Road, Hadleigh	10	This site is in the middle of the greenbelt and is not contiguous with the urban fringe such that it would likely represent unsustainable development.
S0142	Land adjoining 451 & 469 Daws Heath Road, Hadleigh	1	This site prevents the merging of Daws Heath and Hadleigh and due to the small scale of the site, will not be considered further.
S0152	Extension to Silverdale, Thundersley	2	Site would create a gap within the greenbelt. There is an issue with clustering sites S0074, S0152, S0153, S0405 and S0146 as there are multiple landowners. S0146 was deemed not achievable through the SHLAA process down to ecological reasons. That site largely connects all of the sites together and therefore all would not be appropriate for development as various gaps would be produced in the greenbelt. Individually this site chips into the greenbelt for a small un-strategic site.
S0154	West of Bassenthwaite Road, Thundersley	2	This site is in the middle of the greenbelt and is not contiguous with the urban fringe such that it would likely represent unsustainable development.
S0223	Land north of Eastwood Old Road, Hadleigh	46	Site extends into the greenbelt and would result in a ribbon development along the Southend Arterial Road.
S0224	Land north of Eastwood Old Road, Hadleigh	46	Site extends into the greenbelt and would be result in a ribbon

SHLAA Reference	Site Name	Capacity	Justification
			development along the Southend Arterial Road.
S0225	Land north of Eastwood Old Road, Hadleigh	46	Site extends into the greenbelt and would result in a ribbon development along the Southend Arterial Road.
S0393	Land east of Bassentwaite Road, Thundersley	3	This site is in the middle of the greenbelt and is not contiguous with the urban fringe such that it would likely represent unsustainable development.
S0394	Land to the east of Consiton Road, Thundersley	2	This site is in the middle of the greenbelt and is not contiguous with the urban fringe such that it would likely represent unsustainable development.
S0400	Land between Essex Way and Vicarage Hill, Benfleet	100	Although this site lies next to other dwellings it is all designated as greenbelt land. This site is in the middle of the greenbelt and is not contiguous with the urban fringe such that it would likely represent unsustainable development.
S0401	Land between Essex Way and 234 Vicarage Hill, Benfleet	10	Although this site lies next to other dwellings it is all designated as greenbelt land. This site is in the middle of the greenbelt and is not contiguous with the urban fringe such that it would likely represent unsustainable development.
S0404	Land to the rear of 201 Vicarage Hill, Benfleet	1	This site is in the middle of the greenbelt and is not contiguous with the urban fringe such that it would likely represent unsustainable development.
S0405	Land to the east of Borrowdale Road, Thundersley	5	Site would create a gap within the greenbelt. There is an issue with clustering sites S0074, S0152, S0153, S0405 and S0146 as there are multiple landowners. S0146 was deemed not achievable

SHLAA Reference	Site Name	Capacity	Justification
			through the SHLAA process down to ecological reasons. That site largely connects all of the sites together and therefore all would not be appropriate for development as various gaps would be produced in the greenbelt. Individually this site chips into the greenbelt for a small un-strategic site.
S0407	Land on the south side of London Road, Benfleet	7	This site sits in the middle of the greenbelt and not on the urban fringe. Releasing this site and the land between Felstead Road and Catherine Road would create a small gap in the greenbelt. If all of these sites were released this would impact that areas openness especially as the opposite side of the road is a wooded area similar to this. Due to the small scale of this site it is not taken forward.
S0408	Land on the east side of Thundersley Park Road, Benfleet	2	This site is in the middle of the greenbelt and is not contiguous with the urban fringe such that it would likely represent unsustainable development.
S0409	Land at the junction of Thundersley Park Road and Hill road, South Benfleet	3	This site is in the middle of the greenbelt and is not contiguous with the urban fringe such that it would likely represent unsustainable development.
S0410	Land to the east of Church View Road, Thundersley, Benfleet	1	This site is in the middle of the greenbelt and is not contiguous with the urban fringe such that it would likely represent unsustainable development.
S0411	Land to the west of Church View Road, Thundersley, Benfleet	1	This site is in the middle of the greenbelt and is not contiguous with the urban fringe such that it

SHLAA Reference	Site Name	Capacity	Justification
			would likely represent unsustainable development.
S0414	Thatch Farm, Bramble Crescent, Hadleigh	3	This site is in the middle of the greenbelt and is not contiguous with the urban fringe such that it would likely represent unsustainable development.
S0420	Land to the rear of 2 Badgers Way, Benfleet	4	This site is in the middle of the greenbelt and is not contiguous with the urban fringe such that it would likely represent unsustainable development.
S0422	High Warren Farm, Vicarage Hill, Benfleet	60	This site is in the middle of the greenbelt and is not contiguous with the urban fringe such that it would likely represent unsustainable development.
S0425	430 London Road, Benfleet	13	This site lies adjacent to the strategic cluster 'land between Felstead Road and Catherine Road'. The site is proposed for a development of flats which is likely to not create a gradual edge to the greenbelt.
S0428	Land at London Road and east of Downer Road North, South Benfleet	16	Due to scale of site and the potential impacts on the green belt, it is not considered appropriate to consider this further.
S0429	Land at Oakleigh Nurseries, Goldfinch Lane, Benfleet	60	Due to the proximity to the SSSI and the isolated nature of the surrounding development, this site is not considered to be consistent with the defined urban area and would further isolate the greenbelt south of the development.
S0433	Land at the Deanes Academy, Daws Heath Road, Benfleet	100	This site lies adjacent to an ancient woodland and is currently used as a school playing field for the Deanes Academy, its retention is likely to be sought by Sport England. If the potential site

SHLAA Reference	Site Name	Capacity	Justification
			allocation at The Chase development to the west is brought forward, the greenbelt functions that this site currently serves are likely to be impacted. It is suggested that this site is taken out of the greenbelt and re-designated as a site serving community needs.
S0434	Land adjoining Greenacre, 156 Bowers Road, Benfleet	9	This site is in the middle of the greenbelt and is not contiguous with the urban fringe such that it would likely represent unsustainable development.
S0435	Brookside Cottage, Hilltop Avenue, Benfleet	20	This site is in the middle of the greenbelt and is not contiguous with the urban fringe such that it would likely represent unsustainable development.
S0473	Land to the east of 451 Daws Heath Road, Hadleigh	19	Site would contribute to merging of Daws Heath and Hadleigh.
S0477	Land to the east of Coniston Road, Thundersley	2	This site is in the middle of the greenbelt and is not contiguous with the urban fringe such that it would likely represent unsustainable development.
S0402	Land adjacent 37 The Dale, Benfleet	2	Site already has planning permission and has been built out. Numbers cannot contribute to Local Plan housing numbers. The Green Belt boundary will be updated to reflect the planning permission.
S0073	81 Daws Heath Road, Hadleigh	1	Although close to the strategic cluster 'Land east of Rayleigh Road' it is separated by a section of green belt land. Therefore, the allocation of this site would create a gap in the green belt and is not

SHLAA Reference	Site Name	Capacity	Justification
			considered consistent with a strategic release.