



castlepoint

benfleet | canvey | hadleigh | thundersley

STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT UPDATE

31st March 2016

NOTE: THIS STUDY IS NOT A STATEMENT OF COUNCIL POLICY; RATHER IT IS A TECHNICAL DOCUMENT FOR CONSIDERATION IN THE PRODUCTION OF THE NEW LOCAL PLAN.

THE IDENTIFICATION OF A SITE IN THIS DOCUMENT DOES NOT INDICATE THAT CASTLE POINT BOROUGH COUNCIL FAVOURS OR GIVES CONSENT FOR ITS DEVELOPMENT. ALL SITES WILL REQUIRE PLANNING CONSENT, AND WILL BE ASSESSED AGAINST THE LOCAL DEVELOPMENT PLAN AT THE TIME AN APPLICATION IS MADE.

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1. Introduction

Background

- 1.1 In July 2011, Castle Point Borough Council commissioned consultants URS Scott Wilson and CB Richard Ellis to undertake an independent review of the Strategic Housing Land Availability Assessment (SHLAA) in order to provide some certainty to the Council with regard to the capacity of the urban area to accommodate housing growth.
- 1.2 The work carried out by URS Scott Wilson and CB Richard Ellis used a tried and tested methodology for undertaking SHLAAs, focusing on sites of 0.2ha or greater. Their work identified a limited supply of housing land from the existing urban area sufficient to accommodate 1,975 homes.
- 1.3 Historically however, the Council has seen a number of new homes provided on sites of less than 0.2ha in size. As a consequence, the SHLAA Updates of 2012, 2013, 2014 and 2015 extended the methodology to all sites with the potential to accommodate additional homes, including those under 0.2ha in size; this approach has been applied in this update also.

The SHLAA Update 2016

- 1.4 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.
- 1.5 This update has been completed in accordance with the section of the Planning Practice Guidance entitled *Housing and Economic Land Availability Assessment*, building on work previously undertaken by URS Scott Wilson and Council officers in order to ensure that it provides a robust assessment of the likely housing land supply in Castle Point.
- 1.6 Each site has been assessed in terms of its suitability, achievability (viability) and availability, having regard to the constraints affecting each site, ownership information, planning history, and work undertaken by Peter Brett Associates in 2013 on a *Whole Plan Viability Assessment* for Castle Point.
- 1.7 Underpinning the methodology that has been applied is a design-led approach. In 2011 URS Scott Wilson prepared design case studies that have provided a means of estimating site capacity on larger sites (0.2ha +) and also help to illuminate some of the key policy choices that will need to be taken e.g. density, car parking standards and design standards. Smaller sites meanwhile have been assessed using the Council's existing Residential

Design Guidance to determine the likely level of development that could reasonably occur on a development site, having regard to the existing streetscene.

- 1.8 The SHLAA Update is a snapshot in time, representing the situation as at the 31st March 2016. This aligns with the reporting period of the Council's Annual Monitoring Report. Housing land supply is dynamic, with land changing hands all the time and the aspiration of landowners affected by the wider economy as well as personal circumstances. As a consequence sites that were previously identified in the SHLAA may now be removed because these sites may have been redeveloped for a commercial use, or because the owner has decided to extend an existing property rather than re-develop. Equally, new sites have been included in the SHLAA where they have fallen out of use and are now available for housing development, or have obtained planning permission for residential development. Regular monitoring of the SHLAA is necessary in order to provide an up to date picture of housing land supply in Castle Point.

The Study Area

- 1.9 Castle Point, with a population of around 88,600, is made up of two distinct urban areas of Canvey Island and the mainland towns of Benfleet, Hadleigh and Thundersley. Castle Point is bounded to the west by the A130 and the north by the A127. The A13 and the Fenchurch Street – Southend railway line pass through the borough from east to west.
- 1.10 Castle Point's urban area is tightly bound by the Thames Estuary and Green Belt. There is a diverse natural environment including a number of protected sites, and a distinctive landscape including marshland, grassland and ancient woodland.
- 1.11 The borough falls within the Thames Gateway South Essex sub-region and plays a supporting role to the key centres of Basildon to the west and Southend to the east. A significant proportion of the borough's working age population also commute to London for work.
- 1.12 Residential areas in Castle Point are generally low density, with front gardens and gardens to the rear. On Canvey Island there is generally less space around buildings. In town centres, densities are higher, although buildings are typically constrained to three storeys. Canvey Town Centre and the three district centres at Hadleigh, South Benfleet and Tarpots make up the borough's centres. Employment areas are located on the edge of the urban area.
- 1.13 Canvey Island and parts of South Benfleet are located in flood risk zone 2 and/or 3, which raises issues about how much new housing should be built in these parts of Castle Point. However, the resident population is substantially

protected from the risk of flooding by good flood defences, and there are design solutions in housing design and layout which can mitigate the risk of flooding.

- 1.14 Castle Point has a high level of home ownership but a limited range of housing types within the stock. The vast majority of homes are three bedrooms or more and most are detached, semi-detached or bungalows. Property prices have consistently increased over the last 20 years making it difficult for first time buyers and locally employed people to enter the housing market in Castle Point.
- 1.15 Successive Strategic Housing Market Assessments identify a significant need for affordable housing provision in Castle Point. They also identify a need to diversify the range of housing types in Castle Point to include smaller properties.
- 1.16 There is a clear need for more housing and a more diverse housing stock in Castle Point to cater for a wider range of residents from young people, families, older people and people with special accommodation needs. The availability of land for housing will need to be addressed to meet the demand for housing.

Study Approach

- 1.17 The requirement for every local authority to produce a Strategic Housing Land Availability Assessment is set out in paragraph 159 of the National Planning Policy Framework (NPPF).
- 1.18 The Strategic Housing Land Availability Assessment is required to meet the requirements of section 6 of the NPPF entitled *Delivering a wide choice of high quality homes*. Paragraph 47 states the following:

“To boost significant the supply of housing, local planning authorities should:

- *Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;*
- *Identify and update annually a supply of deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;*

- *Identify a supply of specific developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15;...*

- 1.19 For a site to be considered deliverable it should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.
- 1.20 To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.
- 1.21 The approach to this SHLAA is underpinned by the principles set out in the NPPF, and also the detailed guidance contained within the Planning Practice Guidance.

Application of Previous SHLAA Findings

- 1.22 The Council has undertaken an annual review of the SHLAA since 2011. This process has consistently indicated the need for a greater supply of housing land to meet the objectively assessed housing needs of the borough.

Summary of the Findings of this Update

- 1.23 The purpose of the SHLAA is to identify and assess potential housing sites in order to inform the housing potential of Castle Point. This information will inform decisions with regard to the housing target for Castle Point, as well as decisions about the strategic approach and location of housing growth in the borough.
- 1.24 Findings are set out in terms of whether the housing potential identified is from a non Green Belt and Green Belt sources. In addition, Green Belt sites agreed for development by virtue of planning permission have also been included, (hereby known as “Agreed” Green Belt sites).
- 1.25 A total of 431 sites were considered during the 2016 update work. The sites were considered in terms of their suitability, achievability (including viability) and availability, in accordance with the Planning Practice Guidance. Updating the 2015 SHLAA, the following work was undertaken:
- 24 sites were added to the assessment;
 - 17 sites were removed from the assessment because they had been completed in 2015/16;
 - 1 site was removed from the assessment because the landowner no longer wanted to promote the site

1.26 As a result 413 sites are included in the assessment findings, as summarised in Figure 1.

Figure 1: Summary of Sites by Suitability, Availability and Green Belt Policy

Type of Site	Suitability	Availability						TOTAL	
		0 to 5 Years	5 to 10 Years	10 to 15 Years	15 Years +	Stalled	Not Available	Within 15 Years	ALL SITES
Non GB	High	59	18	26	1	4	53	103	161
	Medium	40	37	60	0	1	61	137	199
	Low	1	0	0	0	0	2	1	3
GB PDL	High	3	2	0	0	0	0	5	5
	Medium	2	8	5	0	0	0	15	15
	Low	0	10	1	0	0	0	11	11
GB Partial	High	0	0	0	0	0	0	0	0
	Medium	2	0	0	0	0	0	2	2
	Low	1	0	0	0	0	1	1	2
GB Greenfield	High	2	0	0	0	0	0	2	2
	Medium	11	0	0	0	0	0	11	11
	Low	2	0	0	0	0	0	2	2
TOTAL	High	64	20	26	1	4	53	110	168
	Medium	55	45	65	0	1	61	165	227
	Low	4	10	1	0	0	3	15	18
	ALL SITES	123	75	92	1	5	117	290	413

Figure 2: Summary of Capacity by Suitability, Availability and Green Belt Policy

Type of Site	Suitability	Availability						TOTAL	
		0 to 5 Years	5 to 10 Years	10 to 15 Years	15 Years +	Stalled	Not Available	Within 15 Years	ALL SITES
Non GB	High	237	263	197	104	29	199	697	1029
	Medium	442	471	355	0	2	99	1268	1369
	Low	0	0	0	0	0	21	0	21
GB PDL	High	3	6	0	0	0	0	9	9
	Medium	105	64	0	0	0	0	169	169
	Low	0	2	0	0	0	3	2	5
GB Partial	High	0	0	0	0	0	0	0	0
	Medium	58	95	923	2000	0	0	1076	3076
	Low	6	2	0	0	0	0	8	8
GB Greenfield	High	5	18	0	0	0	0	23	23
	Medium	705	1258	256	0	0	0	2219	2219
	Low	5	10	0	0	0	387	15	402
TOTAL	High	245	287	197	104	29	199	729	1061
	Medium	1310	1888	1534	2000	2	99	4732	6833
	Low	11	14	0	0	0	411	25	436
	ALL SITES	1566	2189	1731	2104	31	709	5486	8330

- 1.27 Figure 1 shows that there are **275 sites** that are suitable (high or medium suitability) and are likely to come forward for development during the next 15 years.
- 1.28 Figure 2 shows that there is a **total capacity of 5,461 homes** that could be delivered on suitable (high or medium suitability) and have the potential to come forward for development during the next 15 years.
- 1.29 However, it is unlikely that this entire capacity would come forward. The aspirations of land owners change over time, and it is common for sites to drop out of the supply for various reasons i.e. redevelopment for another purpose, redevelopment for one large house, or modernisation of the current property. Additionally, viability is potentially an issue for flatted development potentially on Canvey Island. As such a **risk assessment** has been prepared which indicates that the actual capacity is most likely to be in the region of **4,959 homes**.
- 1.30 However, the bulk of the potential housing capacity is located within the Green Belt. The **1998 Adopted Local Plan** is explicit in the protection of the Green Belt. It is therefore considered that just **2,047 homes** could be delivered during the next 15 years. It should be noted that this includes 82 homes which can be delivered from extant consents, 77 of which are on previously developed land within the Green Belt, and a further 5 within the Green Belt.

2. Planning Policy

Introduction

- 2.1 There are a number of national, regional and local planning policies that inform the SHLAA.

National Planning Policy Framework

- 2.2 The National Planning Policy Framework (NPPF) published on the 27th March 2012, sets out the Government's policies for planning in England. The NPPF brings brevity to national planning policy by reducing the previous suite of PPGs and PPSs to a single document of 59 pages. At the heart of the NPPF is a *presumption in favour of sustainable development*. Paragraph 14 of the NPPF defines the implications of this presumption for plan making:

- *Local planning authorities should positively seek opportunities to meet the development needs of their area;*
- *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt rapidly to change, unless:*
 - *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
 - *Specific policies in this Framework indicate development should be restricted.*

- 2.3 In order that the objectively assessed need for housing is properly assessed, paragraph 159 requires local planning authorities to prepare both a Strategic Housing Market Assessment (SHMA) and a Strategic Housing Land Availability Assessment (SHLAA).

- 2.4 With regard to housing delivery in particular, matters are addressed in section 6 of the NPPF. Paragraph 47 states the following:

"To boost significant the supply of housing, local planning authorities should:

- *Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;*
- *Identify and update annually a supply of deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning*

authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;

- Identify a supply of specific developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15;*
- For market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five year supply of housing land to meet their housing target; and*
- Set out their own approach to housing density to reflect local circumstances.”*

2.5 Further policy guidance is also provided in the NPPF on such matters as windfall allowances, the consideration of planning applications in the absence of a five year housing land supply, identifying an appropriate mix of homes in terms of size and tenure, and the need to bring empty homes and buildings back into residential use. There is a requirement to resist inappropriate development of residential gardens.

2.6 Paragraph 52 recognises that the supply of new homes can sometimes best be achieved through planning for larger scale developments. Consideration should be given as to whether this is a sustainable option. The NPPF expects that new settlements or extensions to existing towns should follow the principles of Garden Cities.

2.7 The NPPF also contains policies on Economic development, Green Belt, Flood Risk and Nature Conservation, all of which are relevant to the consideration of sites for housing development in Castle Point.

Planning Practice Guidance – *Housing and Economic Land Availability Assessment*

2.8 The Planning Practice Guidance identifies a five step methodology for undertaking an assessment of housing land availability:

- Stage 1: Site / broad location identification
- Stage 2: Site / broad location assessment
- Stage 3: Windfall Assessment
- Stage 4: Assessment Review
- Stage 5: Final Evidence Base

2.9 Specific guidance on each stage is included within the Planning Practice Guidance. This will be applied throughout this review.

Existing Local Policy

- 2.10 Current planning policy for Castle Point is set out in the Adopted Local Plan 1998. The local plan defines the current extent of the residential development area in Castle Point, and also the extent of the Green Belt area in which there is a presumption against development.
- 2.11 On the 2nd April 2013 a report was published by the Council assessing extant local plan policies against their conformity with the NPPF. This was to be compliant with Paragraph 215 of the NPPF which states that from 27th March 2013, due weight should be given to policies within existing Local Plans according to their degree of consistency with the NPPF.
- 2.12 Policy H2 of the Local Plan states that land allocated for residential purposes within the Local Plan shall be retained primarily for that purpose.
- 2.13 Policy H3 of the Local Plan identified new development sites for the accommodation of housing growth. One of these sites remains undeveloped (Point Industrial Estate). This is considered as two separate housing sites within this assessment.
- 2.14 Policy H4 safeguarded land for long term housing needs at Kings Camp and Thorney Bay Caravan site. King's Camp has been redeveloped as a residential caravan park for the over 50's and is occupied by over 800 mobile homes. It is unlikely to come forward as a traditional development site, and is not therefore considered as part of this assessment. There have however been 2 recent applications by the owners of the Thorney Bay Caravan site for redevelopment for housing. This site is therefore considered as two separate housing sites in this assessment.
- 2.15 Policy H5 safeguards land for long term housing needs off Kiln Road in Thundersley. The majority of this site has attained planning permission for 150 homes, which are nearing completion. The remaining portion of this site has commenced for 71 homes. This site is therefore considered in two separate parts within this assessment.
- 2.16 Policy H6 safeguards land for long term housing needs off Scrub Lane in Hadleigh. This site has been the subject of pre-application proposals and is therefore considered as part of this assessment.
- 2.17 Policy H9 sets out the borough's policy with regard to housing densities. The policy is criteria based and does not contain dwelling density figures.
- 2.18 Policy H13 expects flats and sheltered accommodation to be located on or near a main road.
- 2.19 Policy H14 permits residential development above existing commercial properties.

- 2.20 Policy H17 provides a link to the Council's residential design standards set out in Appendix 12 of the Local Plan. As of January 1st 2013 the design policies contained in Appendix 12 of the Local Plan was superseded by the Residential Design Guidance Supplementary Planning Document. These have been considered in relation to proposals for small sites.
- 2.21 The Council has adopted the Essex Vehicle Parking Standards (2010). These set out requirements for car parking provision, with all but the smallest homes requiring 2 car parking spaces. The standards also specify the size of such spaces.
- 2.22 The Council has also adopted the Essex Design Guide Urban Place Supplement for consideration of design matters in town centre locations. This sets out proposals for achieving high quality, high density development in such locations.

Emerging Local Policy

- 2.23 During the period of this SHLAA (2015/2016) the Council were considering a New Local Plan.
- 2.24 The Draft New Local Plan 2014 made provision for at least 4,000 homes (200 homes per annum).
- 2.25 However in February and March 2016 the Council decided to delete a number of strategic housing sites and move forward with a New Local Plan 2016 providing for at least 2,000 homes (100 homes per annum).
- 2.26 The 2015/2016 SHLAA has therefore been prepared on the basis of the New Local Plan 2016.

3. Study Methodology

Overview

- 3.1 Castle Point has undertaken an annual review of housing land availability in the borough since 2009. This methodology builds on the work that has been undertaken in previous years. However, the Planning Practice Guidance was published in March 2014. As set out above, this includes guidance on the preparation of housing land availability assessments. Careful consideration has been given to this published guidance in the preparation of the SHLAA Update 2016.

Methodology

Stage 1: Site / Broad Location Identification

- 3.2 **Assessment Area:** The first matter to be addressed under this heading is the assessment area. Since 2009, the Castle Point SHLAA and its subsequent updates have covered the entire land area under the administration of Castle Point Borough Council. The Planning Practice Guidance states at Paragraph 007 Reference ID: 3-007-20140306 that the area selected should be the housing market area. However, this would require the alignment of SHLAA work across five individual districts of Thames Gateway South Essex, which is not considered to be practical at this time. Work is underway to better align evidence base work across these five districts, however for the purposes of this SHLAA 2016 Update, the area covered by this assessment is the administrative area of Castle Point Borough Council only.
- 3.3 **Site Size:** The Planning Practice Guidance states at paragraph 010 Reference ID: 3-010-20140306 that housing market assessments should consider all sites and broad locations capable of delivering five or more dwellings. However, historic data for Castle Point indicates that small sites delivering just one or two net additional dwellings have contributed significantly to past delivery in Castle Point. Therefore, repeating the approach taken in the 2012, 2013, 2014 and 2015 SHLAA Updates, this assessment includes all known sites with the potential to make a net contribution to housing supply in Castle Point including sites with a capacity of less than five dwellings.
- 3.4 **Site Identification:** This assessment considers all sites that have been identified to the Council for potential housing development purposes. No constraints are imposed on the number of sites to be assessed, or the location within the borough in which they are to be found.
- 3.5 The majority of sites included within the 2016 SHLAA Update are derived from earlier reviews of the SHLAA. These sites were derived from the following sources:

- Castle Point Council's SHLAA Sites (urban);
- Castle Point Council's Urban Capacity Sites;
- Extant Planning Consents;
- Sites on the Urban Periphery (received from consultation process);
- Hadleigh Town Centre Masterplan;
- Council owned land;
- New sites promoted during consultation on the draft New Local (January – March 2014); and
- Any other potential housing sites known to the Council.

3.6 The 2016 SHLAA Update also includes sites identified from the following sources:

- New sites promoted throughout the year – over time, local agents have become familiar with the process of promoting sites through the completion of a SHLAA form and the provision of a map which is then considered at the next SHLAA update. Where someone contacts the Council who is unfamiliar with this process they are provided with the form to complete and their submission is treated in the same way.
- Planning consents on previously unidentified sites – where a planning consent has been granted on a site not previously included in the SHLAA, it has been incorporated into this update.

3.7 Due to the extent of coverage of the draft New Local Plan, and the resultant interest expressed by landowners in promoting sites, no Call for Sites has been undertaken for the purposes of this 2016 SHLAA Update. Local agents remain aware that they can continue to promote sites for inclusion in the next annual update of the SHLAA.

3.8 **Site Survey:** Where a site has previously been included in the SHLAA, the site survey primarily focuses on updating existing information.

Representations were received by the Council in respect of each of the strategic housing sites identified in the Draft New Local Plan, and those few that were not. These representations have been used to ensure that the site boundaries, nature of the proposal and details related to physical and environmental constraints are correct. They have also been used to determine matters such as capacity, and potential delivery timescales.

3.9 Planning consents and their associated applications also provide a source of information for updating site surveys for sites that have previously been included in the SHLAA. These can provide an accurate capacity value, a greater degree of certainty in relation to the delivery timescale, and demonstrate how physical and environmental constraints have been overcome.

3.10 In terms of new sites, the following information has been collected.

- The site location including its boundaries and size;
- The current use of the land and its character;
- Land uses and the character of the surrounding area;
- Physical constraints e.g. access, contamination, topography, flood risk, significant ecological or historic features;
- Potential environmental constraints e.g. air quality, landscape impacts;
- Current policy constraints e.g. Green Belt;
- Potential capacity (as suggested by promoter, or included in planning application);
- Landownership and the current stage of involvement with house builders; and
- Details of any development mix proposed, and any proposals related to the submission of planning applications and the delivery of development including potential build out rates.

3.11 The site survey information is collected on a series of spreadsheets, with each of the sites mapped in the Council's GIS system. This forms the basis for the work undertaken at stage 2.

Stage 2: Site / Broad Location Assessment

3.12 ***Estimating the housing potential of each site*** – The approach to estimating the housing potential of each site varies depending on the information available:

- Where a site has planning consent, the capacity of housing within that planning consent is used within this assessment;
- Where pre-application proposals have been prepared, and it is considered that those proposals address any constraints (physical or environmental) affecting that site, the capacity of housing within that pre-application proposal is used within this assessment;
- In all other cases the following method is used to estimate the housing potential of each site:
 - For large sites, in excess of 1ha a neighbourhood density was applied, as per the URS Scott Wilson SHLAA 2011 (See figure 3);
 - For sites of 0.2ha to 5ha in size, a design case study was applied, as per the URS Scott Wilson SHLAA 2011 (See figure 4); and
 - For sites of less than 0.2ha in size, a Development Control Officer applied the Council's Residential Design Guidance in order to determine the level of development that could reasonably be accommodated on the site.

- 3.13 In all circumstances, the potential housing capacity of each site was reviewed in 2016 to ensure that the most appropriate estimation for the site had been selected.

Figure 3: Extract from SHLAA 2011 – Neighbourhood Density Estimates

Reference	Site Area	Scenario	Gross Density (du/ha)
9	5-10 ha	Scenario A	25
		Scenario B	35
10	Over 10ha	Scenario A	20
		Scenario B	30

Figure 4: Extract from SHLAA 2011 – Design Case Studies

Reference	Site Size (ha)	Description	Site Type	Density (du/ha)
1	0.24	Small town centre site, identified in Town centre masterplan. Designed for non-flood risk areas.	Greenfield	108
1F	0.24	As case study 1, but adapted for flood risk areas	Greenfield	62
2	0.04	Very small suburban vacant site	Greenfield	37
3	1.28	Large suburban site, part of school playing fields, need to maintain some green space	Greenfield	35
4	0.60	Small school site; need to redevelop school elsewhere	Brownfield	51
5	0.32	Small sub-urban residential site with house and very large garden	Brownfield	20
6	1.11	Medium sized Green Belt site	Brownfield	30
7	0.70	Large town centre site, within commercial area. Some commercial needed at street level.	Brownfield	64
8	2.03	Larger site on edge of developed area	Greenfield	28

- 3.14 ***Assessing whether and when each site / broad location is likely to be developed*** – In order to assess whether and when each of the sites was likely to be developed, they were subject to a series of considerations under the headings *Suitability, Availability and Achievability (Viability)*. For existing sites these considerations had previously been applied; however to ensure information was up to date, each site was reviewed for this update.
- 3.15 ***Assessing the suitability of each site / broad location*** – Each site has been assessed in terms of suitability, with consideration given to the potential to avoid or mitigate any impacts that may arise. The following matters, relevant to conditions in Castle Point, have been assessed:

- **Flood Risk** – consideration has been given to Environment Agency Flood Risk Mapping, the Castle Point Strategic Flood Risk Assessment, the South Essex Surface Water Management Plan and any site specific Flood Risk Assessments submitted alongside planning applications. Where a planning application has been approved without objection from the Environment Agency then it is considered that flood risk issues have been resolved. In all other instances, it is considered that appropriate surface water management, flood resistance and flood resilience techniques can be employed to ensure new development is

safe from flooding in Castle Point. However, those sites in Flood Risk Zone 3 are only considered to be appropriate in terms of flood risk if they are suitable in all other regards. A site which is at high risk of flooding, and would also have other negative consequences would not pass the exception test set out in the NPPF.

- **Contamination** – consideration has been given to contamination records held by the Council's Environmental Health service. Where it is suspected that a site is contaminated, it is considered that remediation may be required. Remediation will be noted as an exceptional cost, and may therefore impact on the achievability (viability) of development.
- **Hazardous Installations** – there are two COMAH sites in Castle Point. The Health and Safety Executive identify consultation zones around the installations at these sites, and apply their PADHI methodology to proposals within them. Where a housing proposal falls within one or more of these consultation zones the PADHI methodology has been applied, and where it results in an 'advise against' recommendation, the site is not considered suitable due to its proximity to hazardous installations.
- **Air Quality** – Air Quality Monitoring carried out by the Councils Environmental Health Service has identified a number of locations within the borough where NO_x levels are close to, or exceed European standards. These are mainly near congested junctions and busy roads. Proximity to these locations has been considered, as has the potential for sites to ameliorate air quality impacts through appropriate landscaping and tree planting. Consideration has also been given to the accessibility of sites to services and to public transport provision, thereby reducing the need to travel by private car further contributing to poor air quality.
- **Surrounding Uses** – consideration has been given to the compatibility of residential development with surrounding uses. Where impacts may occur to future residents, or to existing uses, consideration has been given to the use of buffer zones, layout and/or landscaping to mitigate harm.
- **Historic Environment** – consideration has been given to the Essex Historic Environment Record in order to determine whether a proposal will impact on the historic environment. Where a site is known to include heritage assets, consideration has been given to the potential to avoid harm to those assets through the design and layout of development. A record and preserve off-site approach is considered appropriate for archaeological deposits that are not included on the Schedule of Ancient Monuments.
- **Wildlife** – There is a Special Protection Area, six Sites of Special Scientific Interest and over 40 Local Wildlife Sites in Castle Point.

Additionally, there are known to be protected species including badgers and great crested newts present also. The NPPF sets out an approach to nature conservation that seeks to avoid adverse harm to Special Protection Areas and Sites of Special Scientific Interest. Proposals for development in these locations will not therefore be suitable. In respect of all other nature conservation designations and protected species, consideration has been given to the nature conservation hierarchy in order to determine whether significant harm to wildlife can be avoided, mitigated or as a last resort compensated for.

- **Trees and Woodlands** – There are significant areas of Ancient Woodland around Thundersley and Daws Heath. The NPPF is clear that development that would result in the loss of irreplaceable habitats such as ancient woodlands should be refused. Therefore, a development proposal which would result in harm to ancient woodland is not considered suitable. With regard to all other areas of woodland and trees, consideration will be given to the potential to preserve trees, particularly those of high amenity value through the use of TPOs, and also through the design and layout of development.
- **Landscape** – consideration has been given to the character of the surrounding area, and where appropriate to the Green Belt Landscape Character Assessment. Regard has also been had to the designated Ancient Landscapes identified in the Adopted Local Plan (the draft New Local Plan identified these as Historic Natural Landscapes). Where there is the potential for impact to the landscape consideration has been given to the design and layout of development, and to the use of landscaping and tree planting to avoid and mitigate impacts.
- **Open spaces** – open space provision is highly valued by local residents, and also important to their health and wellbeing. It also helps to alleviate pressure on areas of nature conservation importance by providing opportunities for outdoor sport and recreation away from nature conservation habitats. The Open Space Appraisal notes a deficit in open space provision that will increase as the population increases. Therefore, for a development to be suitable, any loss of open space provision should be fully compensated. Additionally, any new development should incorporate new provision of open space to mitigate the impacts of population growth on nature conservation.
- **Access and Transport Capacity** – consideration has been given to the ability to achieve safe access to the site having regard to the capacity of transport networks within the vicinity of the site. The report entitled *Transport Evidence for the New Local Plan* has provided evidence with regard to potential areas of capacity constraint. Consideration has also been given to transport reports submitted alongside planning applications and pre-application proposals. Where it is considered that transport mitigation is needed to ensure that an

appropriate access is provided, and that transport capacity is appropriate then the costs of this will be identified as an exceptional development cost. Where a safe access cannot be achieved then the site will not be considered suitable.

- **GP Capacity** – consideration has been given to the information submitted by NHS England with regard to proposals set out in the draft New Local Plan. This information includes a table showing the capacity, or otherwise, of existing GP surgeries to accommodate new patients. Where a site is located near a GP surgery with capacity this is considered to be suitable. However, where there is a lack of capacity at nearby surgeries, it will be necessary for the development to contribute towards improved GP capacity. This will be noted as an exceptional development cost.
- **School Capacity** – consideration has been given to the information set out in the Essex Commissioning Places report, and also data provided to the Council through consultation on the draft New Local Plan with regard to individual school capacities. Where a site is located near a school with capacity this is considered to be suitable. However, where there is a lack of capacity in nearby schools, it will be necessary for the development to contribute towards improved school capacity, this may in some cases (very large sites) require the on-site provision of a school. This will be noted as an exceptional development cost.
- **Public Transport Accessibility** – the increased usage of public transport is promoted by the NPPF due to the benefits it offers in terms of congestion reduction, air quality improvement and climate change impacts. Suitable sites will be located within 400m (5 minute walk) of public transport provision. Sites up to 800m (10 minutes walk) are however considered acceptable. Where this cannot be achieved consideration will be given to the potential to extend public transport provision closer to a site. The costs associated with this will be noted as an exceptional development cost.

3.16 Consideration has not been given to the capacity of utilities infrastructure. Advice received from utilities providers indicates that the levels of growth proposed in Castle Point are unlikely to result in the need for significant new utilities infrastructure. There will however be requirements for localised improvements to infrastructure and the provision of infrastructure within development sites, particularly those on the urban periphery. However, it is anticipated that such utility connections will be reflected within the normal development costs.

3.17 There are a number of constraints that may impact on the design and layout of proposals (wildlife, historic assets, landscape impacts), ultimately impacting on site capacity. Therefore, once the site suitability assessment was complete, site capacities were, where necessary, amended to reflect any

impacts arising from constraints. Where required a note was made of the amendment.

3.18 ***Assessing the Availability of each Site / Broad Location*** – each site has been assessed in terms of its availability for the provision of housing development in order to determine whether it is a deliverable site (within five years), a developable site (within five to ten years, or ten to fifteen years), or a site that is unlikely to become available within the assessment period. The following matters have been considered in order to determine availability:

- **The site promoter** – the NPPF is clear that a willing land owner and a willing developer are necessary in order to make development deliverable. Consideration of who is promoting the site for development is therefore indicative as to whether there is a willing landowner and a willing developer. Landownership and developer interests can also impact on the timescale for delivery.
- **Planning Status:** In order for a site to contribute towards housing land supply it requires planning consent. Planning consent can take time to achieve, thereby affecting the availability of the site.
- **Current Use Status:** The current use of a site can determine whether it is likely to become available for development sooner or later in the plan period. For example, a vacant site is likely to become available sooner than a site in a use which has a high value.
- **Policy Constraints:** Where a site is within a residential area it is assumed that the principle of housing development is supported and policy does not therefore constraint the availability of the site for housing. However, in the Green Belt for example there is a presumption against development set out in the NPPF. Green Belt boundaries may only be altered through a review of a plan, and therefore a plan review is required for such a site to become available. Another example relates to town centre sites. It is typically expected that shops, or other active frontage uses are provided at ground floor level, with homes provided above. This policy constraint can affect availability, particularly in times of economic restraint.
- **Legal Constraints:** There may be landownership issues, covenants, previous S106 Agreements or bylaws which restrict the development of a site for housing. Where these are known to exist they have been recorded in order to make a judgement on the availability of a site. It is possible in some cases that these legal restrictions can be resolved; however this may take time affecting the timescales for delivery.
- **Achievability:** Matters of achievability are discussed in detail below. However, it is assumed that developers and landowners will make a judgement on when to bring forward a development site having regard to information on the proposals viability. Sites with good viability are more likely to be developed sooner than sites with poor viability.

- 3.19 Whilst changes to capacity do not normally arise from issues of availability, it should be noted that legal issues can sometimes affect the way in which a site is accessed, or the way in which it is designed, consequently affecting the site capacity. Where this is the case the capacity has been adjusted accordingly and a note made.
- 3.20 ***Assessing the Achievability of each Site / Broad Location*** – where a development site is under construction it is considered to be achievable. In all other cases, the site has been assessed against the findings of the Whole Plan Viability Assessment prepared to accompany the draft New Local Plan. The Whole Plan Viability Assessment used a site typology approach to determine the viability of different types of residential development in Castle Point. As property values are typically higher in Benfleet than they are on Canvey Island separate assessments were carried out for each of these areas for each site type.
- 3.21 The key finding of this assessment was that viability is higher in Benfleet than it is on Canvey Island. As a consequence, there is more potential to deal with exceptional development costs in this area whilst ensuring a reasonable return to a willing landowner and a willing developer (as required by the NPPF).
- 3.22 On Canvey, the values of development are lower, and the costs are higher as a consequence of flood resistant and resilience measures which were included within the assessment. Therefore, the potential to accommodate exceptional development costs is lower, with such costs having the potential to affect the return to the landowner and developer. This may mean that sites with exceptional development costs are not viable, and may not therefore be achievable.
- 3.23 An additional key finding was that developments comprising houses only, or a high proportion of houses to flats were more viable than flatted development schemes. Indeed, in 2013, it was considered that flatted development schemes were not viable in Castle Point, and would not provide a reasonable return to a willing landowner and developer. The assessment did however consider changes to the market, and as a consequence it is considered that flatted developments within the Benfleet area will become viable in the future. Due to the additional costs associated with flood resistance and resilience, it is not thought that flatted developments on Canvey will become viable. However proposals for flatted schemes on Canvey are still coming forward.
- 3.24 As a consequence of the review of site suitability, exceptional development costs have been identified in relation to some sites. Where these have been identified, consideration has been given to their impacts on viability having regard to the findings of the Whole Plan Viability Assessment and the ability of sites to accommodate exceptional development costs.

- 3.25 There are instances where sites are identified for flatted development purposes, and are not therefore considered viable. Where the location of the site would allow for it to be developed with houses instead, the viability of this alternative proposal has also been considered. Where this improves the likelihood of a scheme coming forward this alternative proposal has been progressed in the SHLAA. In such instances the capacity assessment has been amended, with a note included to explain the amendment.
- 3.26 ***Assessing the timescale and rate of development at each site / broad location*** – the assessment of availability will have determined roughly when development of a site is likely to occur i.e. within five years, within five to ten years or within ten to fifteen years. However, in order to inform the plan-making process it is necessary to consider how many homes each site will contribute within a given time period. Very large sites for example may take many years to deliver covering more than one time period.
- 3.27 The planning status of the site is likely to determine when delivery of a site may commence. For example, a site with planning permission is likely to be able to deliver houses sooner than a site without planning permission. Figure 5, sets out lead in times that have been applied in the preparation of this report. For sites that are considered to be deliverable within the period ‘within five years’ the lead in times are applied from April 2015. For those that are considered to be developable ‘within five to ten years’ the lead in times are applied to April 2020, and for those that are considered to be developable ‘within ten to fifteen years’ the lead in times are applied to April 2025. No lead in time is applied for sites that are already under construction.

Figure 5: Lead in Times for Residential Development

Site Status	Site Size					Notes
	Flats	1 to 4 houses	5 to 19 houses	20 to 50 houses	51 + dwellings	
Full / Reserved Matters	1 year	1 year	1 year	1.5 years	2 years	Allows for discharge of conditions and infrastructure provision. Assumed this is more complicated and timely for larger sites.
Outline	1.5 years	1 year	1.5 years	2 years	2.5 years	In addition to the matters above, an additional 6 months is allowed for larger sites for the reserved matters application.
Resolution subject to S106	+ 0.5 years to Full or Outline lead in time					Some section 106 Agreements can be complicated therefore where they are required an additional 6 months is allowed for them to be put in place.

Site Status	Site Size					Notes
	Flats	1 to 4 houses	5 to 19 houses	20 to 50 houses	51 + dwellings	
Site without planning permission	2 years	1.5 years	2.5 years	3 years	3.5 years	To allow time for a Full planning application to be considered, an additional 6 months has been included to the timescales required for a reserved matters application, and a further 6 months for the S106 agreement for larger sites.

- 3.28 With the exception of the very smallest sites, it is unlikely that any development will be completed in one year. In most cases the developer will spread delivery over time having regard to cash flow, the availability of builders and consideration of the local housing market.
- 3.29 Small schemes are most likely to be delivered by local developers. These organisations will have access to smaller cash flows, but will need a more consistent flow of money and work for their employees. Therefore, small schemes will be delivered relatively quickly but at a low building rate of between 5 and 10 units per annum.
- 3.30 Larger schemes meanwhile will be delivered by larger development companies with a regional or national interest. These organisations move resources between sites, and will therefore look to bring forward sites at a quicker rate, having regard to conditions in the local housing market. That being said, there is currently a shortage of building materials and skilled labour to supply the housing market which is expected to constrain supply for the next two years as the industry recovers.
- 3.31 In the case of both large and small schemes, and local and larger scale development companies the same issue arises with flats. An entire block must be completed before they can be occupied. Therefore, the build rate for flats is based on blocks rather than individual units. For schemes of 51+ dwellings, flats are included within the site delivery rate however.
- 3.32 Indicative build rates have been derived for different sized development schemes in Castle Point having regard to rates that are normally achieved in the local area. These are set out in Figure 6. It should be noted that where development has already commenced the appropriate rate has been applied to the residual capacity only. No recalculation of past delivery has been undertaken to align with these rates.

Figure 6: Build Rates

Site Size	Year 1	Year 2 onwards	Note
Flats	Any demolition (loss)	1 block per annum	
1 to 4 houses	Any demolition (loss)	4 houses per annum	Local developer assumed.
5 to 19 houses	5 houses	10 houses per annum	Local developer assumed.
20 to 50 houses	10 houses	20 houses per annum	Large developer assumed.
51+ dwellings until April 2016	20 houses	30 houses per annum	Large developer assumed; Brick shortage limiting supply.
51+dwellings from April 2016	20 houses	50 houses per annum	Large developer assumed; Brick shortage resolved.

Stage 3: Windfall Assessment

- 3.33 Where justified, a Council is permitted by paragraph 48 of the NPPF to include a windfall allowance in their calculations of housing land supply. However, planning practice clearly indicates that it is necessary to both demonstrate historic supply from windfall sites and the potential that similar sites are likely to be available in the future.
- 3.34 Castle Point has historically achieved supply from windfall sites. In the period from 2010 to 2016, an average of 11.5 homes per annum has been delivered on windfall sites. However, the actual numbers during this period have varied from 1 in a year to 20 in a year. This makes it very difficult to use historic data to confidently predict supply from windfall in the future.
- 3.35 In terms of future supply, it is noted that historic supply from windfall sites normally occurs on small sites (less than five dwellings). This assessment includes small sites such as this, and therefore has a specific capacity attached to provision from such sites. There is however some issues associated with this approach, as many of the smaller sites without planning consent included within this assessment were identified through survey work. As such they are not promoted by the landowners, and the timescales for their delivery are therefore less certain. Most have cautiously been assessed as being developable in the longer term (11 to 15 years). Given the risks associated with the inclusion of these smaller sites within the SHLAA capacity, it would appear unwise to also include a windfall allowance, as any windfall that does occur may counteract under-delivery from identified small sites.
- 3.36 Having regard to the evidence, it is not considered appropriate to include a windfall allowance within the 2016 SHLAA Review.

Stage 4: Assessment Review

- 3.37 **An overall trajectory** - Each site / broad location assessed within this review has been identified as being deliverable, developable, or not developable as per the definitions set out in the NPPF and in the Planning Practice Guidance. Where sites are assessed as being deliverable or developable, a housing

trajectory has been prepared showing the overall capacity of all suitable, achievable and available sites within the SHLAA.

3.38 **Risk Assessment of the Housing Trajectory** – The Planning Practice Guidance states that as part of the stage 4, an overall risk assessment should be made as to whether sites will come forward as anticipated. It is unlikely that every site in the SHLAA will come forward, as land supply is dynamic and affected by a whole range of factors and actors. It is therefore necessary to assess the risk that development will not take place as predicted. Previously, the 2014 SHLAA Update dealt with this matter by applying percentage reductions, although this was subject to questioning as there was no empirical basis for the percentage reductions applied. Therefore, as part of the 2014 and subsequent updates since, consideration has been given to risks to achieving the capacity set out in the overall trajectory.

- **Expired applications** – Over the past 7 years, on average 6 applications for housing have expired each year with an average capacity of 19 homes lost from the supply each year. It is therefore considered appropriate to conclude that around 19 home per year will be lost from the first five years of supply as any existing planning applications expire. This results in a total deduction from supply of 95 homes.
- **One for one replacement** – There are many small sites included within the potential housing supply with the potential to deliver two or three homes where there is currently one home. However, on occasions the Council will receive a planning application to redevelop such sites to provide one large house instead of two or three smaller houses. Typically two sites are lost from the supply this way each year resulting in a loss of capacity of 2 net additional units per year. Over the period of this assessment this results in a total deduction of 30 homes from the supply.
- **Redevelopment for non-residential use** – There has been occasions in the past where sites suitable for residential development have been granted planning consent for redeveloped for non-residential purposes. Examples include the former Essex County Council Offices on Kiln Road, and the former focus DIY Store on Rushbottom Lane. This has resulted in these sites being removed from the housing land supply. Historic data indicates that on average, 12 units per annum are lost to redevelopment for non-residential uses. If this is applied over the period of this assessment this results in a total deduction of 180 homes from the supply.
- **Viability** – as set out in the *Assessing Achievability* section, sites on Canvey Island are not as viable as schemes in Benfleet. Additionally, flatted developments have viability issues, particularly on Canvey Island in the future. Nonetheless, there are some proposals for flatted

development on Canvey Island included within this assessment due to extant planning consents, or due to the location of the site which would render a house type development unsuitable (town centre). To account for the risk of non-delivery of these schemes a 20% reduction has been applied to capacity derived from flatted developments on Canvey Island which are not actively under construction.

- **Existing use value** – A proportion of the sites included within the SHLAA have an existing use value. As a consequence these may not be pursued for residential development within the assessment period. There is currently one stalled site for residential development where there is a high value existing use (320 London Road, Hadleigh – National Tyres). This represents 3.6% of those homes with extant planning consent. A proportional reduction of 3.6% has been applied to the overall trajectory to account for sites that stall, or otherwise are not delivered due to high existing use values. This was applied after other deductions to avoid double discounting.

3.39 Once the overall level of deduction arising from risk factors was calculated, a revised trajectory was prepared.

3.40 ***Trajectory based on policies in 1998 Adopted Local Plan*** – The overall trajectory includes all sites regardless of their current policy designation. A trajectory has been prepared which excludes sites that cannot be brought forward due to existing policy restrictions. This indicates the impact the existing policies in the 1998 Adopted Local Plan have on housing land supply.

3.41 ***Trajectory based on proposals in the New Local Plan 2016*** – The trajectory based on the policies in the 1998 Adopted Local Plan has been updated to include policy changes proposed in the New Local Plan 2016. This indicates the impact that the proposals in the New Local Plan 2016 have on housing land supply.

Stage 5: Final Evidence Base

3.42 Having prepared the housing supply trajectories, it was necessary to compare these to housing requirements in order to understand housing supply issues in Castle Point, with a particular focus on determining whether there is a five year housing land supply as required by the NPPF.

3.43 ***Objectively Assessed Need*** - In terms of housing need, the NPPF expects local planning authorities to meet their full objectively assessed need for housing. The Planning Practice Guidance in relation to assessing housing need is clear that the CLG Household Projections are the starting point for determining housing need, although other factors such as economic growth requirements, the need for affordable housing, and market indicators such as house prices should be taken into account also.

- 3.44 As at 31st March 2016 there is no up to date plan and no assessment of housing need across the Thames Gateway Housing Market area which addresses the requirements of the Planning Practice Guidance. In such instances the Planning Practice Guidance advises that the CLG Household Projections should be used to determine whether supply aligns with need. CLG Household Projections 2012 were relevant, which indicate, in the case of Castle Point, a requirement for 285 homes per annum.
- 3.45 The supply of homes impacts on the need and the provision of affordable housing. Where supply and demand is in reasonable alignment house prices do not inflate as rapidly, ensuring better affordability. Meanwhile, it is common practice that affordable housing provision is secured as a proportion of provision on larger sites. As such, the larger the overall provision of housing, the larger the provision of affordable housing. The TGSE SHMA Review 2013 indicates that provision in line with CLG Household Projections would require approximately 43% of new homes across the housing market area to be affordable in order to meet the need for affordable housing. Lower levels of provision saw the proportional requirement for affordable housing increase.
- 3.46 As at 31st March 2016 a review of the TGSE SHMA was being finalised to taking into account the most up to date population and household data.
- 3.47 **Past Under-delivery** – Much of the data currently in use to determine housing need now has a basis in the 2011 Census. As a national survey of all citizens, the 2011 Census provides a clear indication of where people lived, and what their circumstances were at a fixed point in time. Therefore, any needs calculations using data arising from the 2011 Census will have captured the effects of past under-delivery to that point in time, with the future consequences reflected in calculations for future housing provision. Therefore, the 2016 SHLAA Review considers past under-delivery in the period since April 2012 only, assuming that to do otherwise would double count requirements for housing already identified in housing need calculations.
- 3.48 In accordance with the Planning Practice Guidance, under-delivery in the period from April 2012 to March 2016 will be added to the need for housing in the next five years. During this period, only 445 additional homes (net) were delivered in Castle Point. When compared to Objectively Assessed Need, as based on the CLG 2012 Household Projections, this results in under-delivery of the order of 695 homes. This will increase the annual requirement of housing for each of the next five years by 139 homes.
- 3.49 **Supply Buffer** – The NPPF states that in order to ensure a sufficient supply of sites to provide a five year housing land supply, an additional buffer of 5% should be added to the five year housing land supply requirement to ensure choice and competition in the market. This buffer should be moved forward

from later in the plan period. Where there has been a pattern of persistent under-delivery in a local authority area, this buffer should be increased to 20%. This buffer should be achieved by moving sites forward in the supply pipeline from later in the plan period.

- 3.50 As indicated in the section above, there has been persistent under delivery in Castle Point. As such, it is necessary to provide a 20% supply buffer. This increases the five year housing requirement by 285 homes – 57 homes per annum.
- 3.51 ***Comparison of Housing Supply with Housing Need*** – Having identified an appropriate determinant of housing need for Castle Point, based on current available data, and made adjustments for past under-delivery and a supply buffer, it was possible to compare housing need with housing supply as identified in the housing trajectories prepared for stage 4 of this assessment.
- 3.52 The four trajectories (overall trajectory, risk assessed trajectory, current policy trajectory and 2016 policy trajectory) were all compared to the calculated need for housing in order to determine whether a) there is a five year housing land supply; and b) whether there is sufficient housing supply to meet housing needs in the longer term.

4. SHLAA Update Findings

Introduction

- 4.1 This section sets out the results of the SHLAA Update, showing housing capacity by ward, by site type (non Green Belt / Green Belt) and by expected delivery period.
- 4.2 The SHLAA information is contained within a series of spreadsheets which hold a large amount of information for each site. A summary of the information can be found at Volume 2 Schedule A.

Site Suitability

- 4.3 The suitability of 413 sites was assessed. 168 sites were found to be of a high suitability. Little mitigation is required to bring these sites forward for development. These sites have a total capacity of 1061 homes.
- 4.4 A further 227 sites were found to be of medium suitability. Such sites would require a degree of design adaptation or mitigation work to be undertaken in order to achieve a suitable development. Key constraints requiring such work include flood risk and ecology. Access was also an issue for some sites. These sites have a total capacity of 6,833 homes.
- 4.5 Just 18 sites were found to be of a low suitability. This was generally as a consequence of their remote location to services, although some sites were found to be of low suitability due to the impact they would have on ecology and/or the loss of protected woodland. These sites have a total capacity of 436 homes.
- 4.6 Information on the site suitability assessment can be found in Volume 2 Schedule D.

Site Availability and Achievability

- 4.7 Each site was assessed according to whether it was judged to be available and achievable. Availability was based on whether there was clear intention by a developer or landowner to develop the site for housing. Achievability was based on cost and market factors, having regard to the economic viability work carried out by Peter Brett Associates in 2013.

Viability

- 4.8 The majority of sites are most suitably developed for houses, as opposed to flats, or for a mix of units. As such the findings of the viability work carried out by Peter Brett Associates indicated that in the main the development sites identified within the SHLAA are viable.
- 4.9 Viability issues were identified with regard to flatted development schemes on Canvey Island, where the Peter Brett Assessment indicates that such development would not be viable now, or in the future. This affects the

potential delivery of 192 homes identified in the SHLAA. That being said, there has been a resurgence of development activity in relation to flatted development on Canvey Island in recent years, which may require this evidence to be re-examined.

- 4.10 Viability concerns also arose with regard to those sites which are likely to require significant infrastructure investment. The key site affected by this is the North West Benfleet Urban Extension which would require the extension of utilities infrastructure and also the provision of significant highways infrastructure.

Availability

- 4.11 Having regard to viability, each site was considered in terms of availability, having regard to the current use, the known intentions of the landowner and any progress that had been made in relation to planning. This assessment revealed that there were some sites within the existing urban area that are not currently available. Several of those sites that were identified previously through the urban capacity study have been restored to a good condition, with some having recently been extended or otherwise improved. As such these are not currently available and have been removed from calculations of supply.
- 4.12 Overall, there are 276 sites with a capacity of 7,565 homes that are considered to be both suitable and available for housing, of which it is expected that 5,461 homes can be delivered within the next 15 years on 275 sites.

Timescale and Phasing

- 4.13 Whilst each available site has been identified as being deliverable now (0 to 5 Years) or being developable in the future (5 to 10 Years, 10 to 15 Years or 15 Years +), it is recognised within this assessment that the delivery of sites will be phased over time. Depending on the current planning status, there will be a lead in time for each site where planning consent is sought, conditions are discharged and initial ground work is undertaken. Each site will then be built out at a given rate depending on the availability of resources and on the conditions in the housing market.
- 4.14 These considerations have been used to determine the delivery of each site over time, with in some cases the capacity of the site falling into two, or more, plan phases. This is particularly a consideration for larger sites.
- 4.15 This results in a maximum housing supply capacity for years 0 to 5 of 1,555 homes, a maximum housing supply capacity for years 5 to 10 of 2,175 homes and a maximum housing supply capacity for years 10 to 15 of 1,731 homes. It is thought a further 2,104 homes could be delivered in the period beyond 15 years.

- 4.16 A phasing estimate for each site has been prepared as part of this assessment and is available to view at Volume 2 Schedule B.
- 4.17 It should be noted that this estimate is not intended to constrain development, but to present a realistic picture of as and when development is likely to come forward on each site, and at what rate.

Capacity Estimate

- 4.18 A capacity for each site has been determined having regard to the relevant design scenarios set out earlier in this report, plus any additional information arising from planning applications, pre-application discussions and/or representations from developers/landowners to the draft New Local Plan. The capacity assessment for each site can be found at Volume 2 Schedule C.

Maximum Housing Potential (Trajectory 1)

- 4.19 Figure 7 shows the maximum housing potential for Castle Point identified through this SHLAA Update. It shows the capacity of all suitable (high and medium) sites and the phasing of that capacity over time. The maximum housing potential for Castle Point is 5,461 homes over the next 15 years, with an additional potential for 2,104 homes to be delivered beyond that period.

Figure 7: Maximum Housing Potential (Trajectory 1)

Type of Site	Suitability	Availability						TOTAL	
		0 to 5 Years	5 to 10 Years	10 to 15 Years	15 Years +	Stalled	Not Available	Within 15 Years	ALL SITES
Non GB	High	237	263	197	104	29	199	697	1029
	Medium	442	471	355	0	2	99	1268	1369
	Low	0	0	0	0	0	21	0	21
GB PDL	High	3	6	0	0	0	0	9	9
	Medium	105	64	0	0	0	0	169	169
	Low	0	2	0	0	0	3	2	5
GB Partial	High	0	0	0	0	0	0	0	0
	Medium	58	95	923	2000	0	0	1076	3076
	Low	6	2	0	0	0	0	8	8
GB Greenfield	High	5	18	0	0	0	0	23	23
	Medium	705	1258	256	0	0	0	2219	2219
	Low	5	10	0	0	0	387	15	402
TOTAL	High	245	287	197	104	29	199	729	1061
	Medium	1310	1888	1534	2000	2	99	4732	6833
	Low	11	14	0	0	0	411	25	436
	ALL SITES	1566	2189	1731	2104	31	709	5486	8330

4.20 Figures 8 to 11 show the distribution of the maximum housing potential of suitable sites by ward and by town. 24% of the supply is located in Benfleet, 26% on Canvey Island, 21% in Hadleigh and 29% in Thundersley.

Figure 8: Maximum Housing Potential for Benfleet

Ward	Site Type	Availability						TOTAL	
		0 to 5 Years	5 to 10 Years	10 to 15 Years	15 Years +	Stalled	Not Available	Within 15 Years	ALL SITES
Appleton	Non GB	23	0	12	0	3	50	35	88
	GB PDL	0	5	0	0	0	0	5	5
	GB Partial	0	0	0	0	0	0	0	0
	GB Greenfield	0	175	0	0	0	0	175	175
Boyce	Non GB	50	6	28	0	6	48	84	138
	GB PDL	55	6	0	0	0	0	61	61
	GB Partial	45	95	0	0	0	0	140	140
	GB Greenfield	37	0	0	0	0	0	37	37
St. Marys	Non GB	28	2	31	0	0	23	61	84
	GB PDL	0	0	0	0	0	0	0	0
	GB Partial	0	0	0	0	0	0	0	0
	GB Greenfield	145	405	150	0	0	0	700	700
BENFLEET TOTAL	Non GB	101	8	71	0	9	121	180	310
	GB PDL	55	11	0	0	0	0	66	66
	GB Partial	45	95	0	0	0	0	140	140
	GB Greenfield	182	580	150	0	0	0	912	912
	ALL SITES	383	694	221	0	9	121	1298	1428

Figure 9: Maximum Housing Potential for Canvey

Ward	Site Type	Availability						TOTAL	
		0 to 5 Years	5 to 10 Years	10 to 15 Years	15 Years +	Stalled	Not Available	Within 15 Years	ALL SITES
Canvey Island Central	Non GB	17	60	12	0	0	8	89	97
	GB PDL	0	0	0	0	0	0	0	0
	GB Partial	0	0	0	0	0	0	0	0
	GB Greenfield	0	0	0	0	0	0	0	0
Canvey Island East	Non GB	65	59	13	0	0	12	137	149
	GB PDL	0	0	0	0	0	0	0	0
	GB Partial	0	0	0	0	0	0	0	0
	GB Greenfield	0	0	0	0	0	0	0	0

Canvey Island North	Non GB	33	8	13	0	0	2	54	56
	GB PDL	0	0	0	0	0	0	0	0
	GB Partial	0	0	0	0	0	0	0	0
	GB Greenfield	0	0	0	0	0	0	0	0
Canvey Island South	Non GB	130	336	265	0	0	21	731	752
	GB PDL	0	0	0	0	0	0	0	0
	GB Partial	0	0	0	0	0	0	0	0
	GB Greenfield	0	0	0	0	0	0	0	0
Canvey Island West	Non GB	4	6	10	0	0	9	20	29
	GB PDL	0	50	0	0	0	0	50	50
	GB Partial	0	0	0	0	0	0	0	0
	GB Greenfield	100	175	0	0	0	0	275	275
Canvey Island Winter Gardens	Non GB	20	0	20	0	2	4	40	46
	GB PDL	50	0	0	0	0	0	50	50
	GB Partial	0	0	0	0	0	0	0	0
	GB Greenfield	0	0	0	0	0	0	0	0
CANVEY ISLAND TOTAL	Non GB	269	469	333	0	2	56	1071	1129
	GB PDL	50	50	0	0	0	0	100	100
	GB Partial	0	0	0	0	0	0	0	0
	GB Greenfield	100	175	0	0	0	0	275	275
	ALL SITES	419	694	333	0	2	56	1446	1504

Figure 10: Maximum Housing Potential for Hadleigh

Ward	Site Type	Availability						TOTAL	
		0 to 5 Years	5 to 10 Years	10 to 15 Years	15 Years +	Stalled	Not Available	Within 15 Years	ALL SITES
St. James	Non GB	164	107	0	0	20	46	271	337
	GB PDL	0	0	0	0	0	0	0	0
	GB Partial	0	0	0	0	0	0	0	0
	GB Greenfield	0	0	0	0	0	0	0	0
Victoria	Non GB	12	4	24	0	0	19	40	59
	GB PDL	3	9	0	0	0	0	12	12
	GB Partial	0	0	112	0	0	0	112	112
	GB Greenfield	196	403	106	0	0	0	705	705
HADLEIGH TOTAL	Non GB	176	111	24	0	20	65	311	396
	GB PDL	3	9	0	0	0	0	12	12
	GB Partial	0	0	112	0	0	0	112	112
	GB Greenfield	196	403	106	0	0	0	705	705
	ALL SITES	375	523	242	0	20	65	1140	1225

Figure 11: Maximum Housing Potential for Thundersley

Ward	Site Type	Availability						TOTAL	
		0 to 5 Years	5 to 10 Years	10 to 15 Years	15 Years +	Stalled	Not Available	Within 15 Years	ALL SITES
Cedar Hall	Non GB	99	4	66	0	0	25	169	194
	GB PDL	0	0	0	0	0	0	0	0
	GB Partial	0	0	311	0	0	0	311	311
	GB Greenfield	89	0	0	0	0	0	89	89
St. Georges	Non GB	2	0	2	0	0	13	4	17
	GB PDL	0	0	0	0	0	0	0	0
	GB Partial	0	0	0	0	0	0	0	0
	GB Greenfield	140	0	0	0	0	0	140	140
St. Peters	Non GB	32	142	56	104	0	18	230	352
	GB PDL	0	0	0	0	0	0	0	0
	GB Partial	13	0	500	2000	0	0	513	2513
	GB Greenfield	3	118	0	0	0	0	121	121
THUNDER SLEY TOTAL	Non GB	133	146	124	104	0	56	403	563
	GB PDL	0	0	0	0	0	0	0	0
	GB Partial	13	0	811	2000	0	0	824	2824
	GB Greenfield	232	118	0	0	0	0	350	350
	ALL SITE	378	264	935	2104	0	56	1577	3737

Risk Assessment of Housing Potential (Trajectory 2)

- 4.21 As explained in the methodology section of this report, it is unlikely that all the identified suitable and available sites will be brought forward for development. The aspirations of landowners and developers will change, and alternative uses will compete for land, in some cases successfully. As such a revised trajectory has been prepared which applies reductions to the maximum supply, having regarded identified risks to capacity. The risk assessment results in a reduction in capacity over the 15 year period of 527 homes.

Figure 12: Risk Assessment of Housing Capacity

Risk Factor	Availability			TOTAL
	0 to 5 Years	5 to 10 Years	10 to 15 Years	
Total Capacity	1566	2189	1731	5486
Expired Applications	95	0	0	95
One for One Replacements	10	10	10	30
Redevelopment for Non-residential Use	60	60	60	180
Viability	10	23	4	37
Existing Use Value	50	75	60	185
Risk Assessed Capacity	1341	2020	1597	4959

4.22 In terms of stalled sites, there are currently 5 stalled sites within Castle Point with a capacity of 31 homes.

Housing Potential Available in Accordance with 1998 Adopted Local Plan (Trajectory 3)

4.23 The current adopted Local Plan explicitly restricts development within the Green Belt except in certain, very special circumstances. As such, the capacity for housing identified within the Green Belt is not available at this time, with the exception of those sites within the Green Belt (Brickfields, 396 to 408 London Road, Rear of 17 & 19 Downer Road, 34 Crescent Road, Oak Tree Farm, and Nashlea Farm) which currently benefit from planning consent. A revised trajectory has been prepared applying the policies within the current adopted Local Plan with regard to the Green Belt. This shows that the majority of the sites within the existing urban area are on Canvey Island, and as such development would be skewed towards Canvey Island if there were no revisions to the development plan.

Figure 13: Housing Capacity Available in Accordance with 1998 Adopted Local Plan

Town	Site Type	Availability			TOTAL 0 to 5 Years	% of Total Supply
		0 to 5 Years	5 to 10 Years	10 to 15 Years		
Benfleet	Non Green Belt	101	8	71	240	12%
	Green Belt with PP	60	0	0		
Canvey	Non Green Belt	269	469	333	1071	52%
	Green Belt with PP	0	0	0		
Hadleigh	Non Green Belt	176	111	24	320	16%
	Green Belt with PP	9	0	0		
Thundersley	Non Green Belt	133	146	124	416	20%
	Green Belt with PP	13	0	0		
Borough-wide	Non Green Belt	679	734	552	1965	96%
	Green Belt with PP	82	0	0	82	4%
	TOTAL	761	734	552	2047	

Housing Potential of Proposal in New Local Plan 2016 (Trajectory 4)

- 4.24 The New Local Plan 2016 proposed some amendments to the Green Belt boundary in order to accommodate higher levels of housing growth, having regard to other components of the evidence base which identify a significant need for such provision. Figure 14 below shows the potential housing trajectory if the proposals in the New Local Plan 2016 were progressed.

Figure 14: Potential Housing Capacity of the New Local Plan 2016

Town	Site Type	Availability			TOTAL 0 to 15 Years	% of Total Supply
		0 to 5 Years	5 to 10 Years	10 to 15 Years		
Benfleet	Non Green Belt	101	8	71	240	9%
	Green Belt with PP	60	0	0		
	Other Green Belt	0	0	0		
Canvey	Non Green Belt	269	469	333	1121	40%
	Green Belt with PP	0	0	0		
	Other Green Belt	0	50	0		
Hadleigh	Non Green Belt	176	111	24	500	18%
	Green Belt with PP	9	0	0		
	Other Green Belt	116	64	0		
Thundersley	Non Green Belt	133	146	124	916	33%
	Green Belt with PP	13	0	0		
	Other Green Belt	0	0	500		
Borough-wide	Non Green Belt	679	734	552	1965	71%
	Green Belt with PP	82	0	0	82	3%
	Other Green Belt	116	114	500	730	26%
	TOTAL	877	848	1052	2777	

5. Applying the Findings of the SHLAA

Comparison with Housing Requirements

- 5.1 On 3rd January 2013 the Secretary of State revoked the East of England Plan. As a result, the housing targets set out in that document are no longer applicable. It is for local planning authorities in accordance with paragraph 47 of the National Planning Policy Framework to use evidence to establish their own housing target based on the full, objectively assessed need for market and affordable housing.
- 5.2 Paragraph 159 of the NPPF is clear that in order to determine the full, objectively assessed need for housing in an area consideration should be given to household and population projections, taking account of migration and demographic change.
- 5.3 As explained in the methodology section of this report, consideration has been given to identifying the objectively assessed need for housing in Castle Point having regard to CLG 2012 Household Projections, which current set the requirement at 285 homes per annum.
- 5.4 Recognising the physical constraints on development which exist within Castle Point, the New Local Plan 2016 planned for at least 100 homes per annum.
- 5.5 This section of the SHLAA will consider the supply of housing land identified in this report against both the Objectively Assessed Housing Need and the New Local Plan 2016 housing target in order to determine the extent to which it is possible to meet either of those requirements.

Objectively Assessed Housing Need

- 5.6 At 285 homes per annum the objectively assessed housing need gives rise to a requirement for 5,023 homes over the next 15 year period. In the period April 2012 to March 2016 only 445 homes have been delivered in Castle Point during this period leaving a requirement for 4,578 homes. At April 2016 there existed an under-delivery of the order of 695 homes. Figure 15 shows the distribution of the remaining requirement over time, having regard to the guidance on the distribution of under-delivery set out in the Planning Practice Guidance.

Figure 15: Objectively Assessed Need Over Time

Period	Initial Requirement	% Buffer	Buffer	Past Under Delivery	Total Requirement	Annual Requirement
0 to 5 Years (2015 – 2020)	1425	20%	285	695	2405	481
5 to 10 Years (2020 – 2025)	1425	5%	71		1496	299
10 to 15 Years (2025 – 2030)	1069	5%	53		1122	224

Figure 16: Comparison between Objectively Assessed Need and Trajectory 1 – Maximum Potential Supply

	0 to 5 Years	5 to 10 Years	10 to 15 Years	TOTAL
Requirement	2405	1496	1122	5023
Supply	1566	2189	1731	5486
Difference	-839	693	609	463
% Difference	-35%	46%	54%	9%
Supply in Years	3.3			

Figure 17: Comparison between Objectively Assessed Need and Trajectory 2 – Risk Assessed Potential Supply

	0 to 5 Years	5 to 10 Years	10 to 15 Years	TOTAL
Requirement	2405	1496	1122	5023
Supply	1341	2020	1597	4959
Difference	-1064	524	475	-65
% Difference	-44%	35%	42%	-1%
Supply in Years	2.8			

Figure 18: Comparison between Objectively Assessed Need and Trajectory 3 – 1998 Adopted Local Plan Policy

	0 to 5 Years	5 to 10 Years	10 to 15 Years	TOTAL
Requirement	2405	1496	1122	5023
Supply	761	734	552	2047
Difference	-1644	-762	-570	-2976
% Difference	-68%	-51%	-51%	-59%
Supply in Years	1.6			

Figure 19: Comparison between Objectively Assessed Need and Trajectory 4 – New Local Plan 2016 Proposals

	0 to 5 Years	5 to 10 Years	10 to 15 Years	TOTAL
Requirement	2405	1496	1122	5023
Supply	877	848	1052	2777
Difference	-1528	-648	-70	-2246
% Difference	-64%	-43%	-6%	-45%
Supply in Years	1.8			

- 5.7 Figure 16 shows, that if the potential maximum housing supply in Castle Point was fully realised there is sufficient identified supply within Castle Point to achieve the objectively assessed need for housing. Overall, the capacity of potential housing sites is 9% above the overall housing requirement. When risk factors are taken into account, this decreases to a negative figure of -1%, as demonstrated by figure 17. There would also be an insufficient supply of potential sites to deliver a five year housing land supply (44% deficit).
- 5.8 Figure 18 compares objectively assessed housing need to the supply of land available in accordance with the policies in the 1998 Adopted Local Plan, currently used when making decisions on planning applications in Castle Point. This shows that the supply of land is significantly less than the objectively assessed need, and as such there would be a deficit of supply of

59%. It should be noted that there is a very high deficit of supply in years 0 to 5 (i.e. the five year housing land supply) of 68%. As policy currently stands supply sits at just 1.6 years, and not the 5 years required.

- 5.9 Figure 19 compares the proposals in the New Local Plan 2016 with the objectively assessed housing need. This shows that the supply of housing would be 2,777 homes. This would be 45% below the objectively assessed need, and as with the other trajectories, there would be a significant deficit in years 0 to 5 (i.e. the five year housing land supply) of around 64%. This would mean that the five year supply within the plan would only be at most 1.8 years.

New Local Plan 2016 Housing Target

- 5.10 The New Local Plan 2016 proposed a housing target of at least 200 homes per annum. This recognised the constraints on development in place in Castle Point, including environmental constraints, constraints on housing supply and constraints on infrastructure capacity. This alternative target would require at least 2,000 homes to be delivered in Castle Point in the period 2011 to 2031. 495 homes were delivered in the period from 1st April 2011 to the 31st March 2016. Figure 20 shows what the future housing requirement would look like if a housing target of 100 homes per annum was pursued:

Figure 20: New Local Plan 2016 Housing Target Over Time

Period	Initial Requirement	% Buffer	Buffer	Past Under Delivery	Total Requirement	Annual Requirement
0 to 5 Years	500	20%	100	5	605	121
5 to 10 Years	500	5%	25		525	105
10 to 15 Years	375	5%	19		394	79

Figure 21: Comparison between NLP 2016 Housing Target and Trajectory 1 – Maximum Potential Supply

	0 to 5 Years	5 to 10 Years	10 to 15 Years	TOTAL
Requirement	605	525	394	1524
Supply	1566	2189	1731	5486
Difference	961	1664	1337.25	3962
% Difference	159%	317%	340%	260%
Supply in Years	12.9			

Figure 22: Comparison between NLP 2016 Housing Target and Trajectory 2 – Risk Assessed Potential Supply

	0 to 5 Years	5 to 10 Years	10 to 15 Years	TOTAL
Requirement	605	525	394	1524
Supply	1341	2020	1597	4959
Difference	736	1495	1203	3435
% Difference	122%	285%	306%	225%
Supply in Years	11.1			

Figure 23: Comparison between NLP 2016 Housing Target and Trajectory 3 – 1998 Adopted Local Plan Policy

	0 to 5 Years	5 to 10 Years	10 to 15 Years	TOTAL
Requirement	605	525	394	1524
Supply	761	734	552	2047
Difference	156	209	158	523
% Difference	26%	40%	40%	34%
Supply in Years	6.3			

Figure 24: Comparison between NLP 2016 Housing Target and Trajectory 4 – New Local Plan 2016 Proposals

	0 to 5 Years	5 to 10 Years	10 to 15 Years	TOTAL
Requirement	605	525	394	1524
Supply	877	848	1052	2777
Difference	272	323	658	1253
% Difference	45%	62%	167%	82%
Supply in Years	7.2			

- 5.11 Figures 21 to 24 show that there is sufficient potential housing supply to deliver a housing target of at least 100 homes per annum within the borough. The proposals set out in the New Local Plan 2016 result in a trajectory that would deliver a 7.2 year housing land supply against the proposed target of 100 homes per annum.
- 5.12 The Council's housing target in the New Local Plan 2016 is considerably less than the objectively assessed need, which means that unmet housing need will need to be considered elsewhere in the housing market area.

6. Conclusions

- 6.1 Paragraph 47 of the NPPF states that local planning authorities should plan to meet their full, objectively assessed need (OAN) for market and affordable housing, as far as is consistent with the other policies in the Framework.
- 6.2 As the current policy position stands (1998 Adopted Local Plan), there is insufficient housing land allocated to meet the objectively assessed needs for housing.
- 6.3 The New Local Plan 2016 also allocates insufficient housing land to meet the objectively assessed needs for housing.
- 6.4 The SHLAA indicates that there is some supply of land within the borough to accommodate housing, however much of this supply is constrained by Green Belt, as well as other important constraints. The NPPF is clear that these may be taken into account.
- 6.6 The New Local Plan 2016 seeks to protect the Green Belt over OAN, which is consistent with Government guidance and policy.