

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

Appeal by Countryside Partnerships (Eastern Home Counties)

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

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

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

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

Statement of Common Ground on Housing Land Supply

between

Castle Point Borough Council

&

Countryside Partnerships (Eastern Home Counties)

Signed



Date 10/01/2025

Stephen Garner – Assistant Director Development Services

On behalf of Castle Point Borough Council

Signed *Ben Pycroft*

Date 10/01/25

BEN PYCROFT (Emery Planning)

On behalf of Countryside Partnerships (Eastern Home Counties)

Statement of Common Ground on Housing Land Supply

I. Matters of agreement

The base date and the 5YHLS period

- I.1. It is agreed that the base date is 1st April 2024 and the 5 Year Housing Land Supply (5YHLS) period is to 31st March 2029.
- I.2. It is agreed that sites that were not “deliverable” at the base date should not be included in the 5YHLS.

Housing requirement for the 5 year housing land supply calculation

- I.3. In accordance with paragraph 78 of the December 2024 Framework, the 5YHLS should be measured against the local housing need calculated using the standard method. It is agreed that this is 701 dwellings per annum.

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

- I.4. It is agreed that the latest HDT result (2023 result) is less than 85% (it is 54%) and therefore the 20% buffer applies.

A 5YHLS cannot be demonstrated

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

2. Matters of disagreement

The extent of the deliverable supply

- 2.1. The extent of the deliverable supply is not agreed. The Council considers that the deliverable supply at 1st April 2024 is 1,143 dwellings. The Appellant considers that the deliverable supply at 1st April 2024 is 463 dwellings.
- 2.2. The reason for the difference of 680 dwellings between the two parties is set out in the following table:

SOCG Table I – Disputed sites

Ref:	Address	Status at 1 st April 2024 as set out in the AMR	No. of net dwellings in the 5YHLS disputed	Summary reason for dispute
HO15	Land south of Scrub Lane	Pre-app	49	The site does not have planning permission and the Council has not provided clear evidence for its inclusion in the 5YHLS
HO17	Hadleigh Island Site	Pre-app	40	The site does not have planning permission and the Council has not provided clear evidence for its inclusion in the 5YHLS
HO22	Land at Thames Loose Leaf	Pre-app	12	The site does not have planning permission and the Council has not provided clear evidence for its inclusion in the 5YHLS
HO25	Land at Thorney Bay	Proceeding under existing consents	120	The AMR does not list the consents or provide an explanation why 120 net dwellings should be included in the 5YHLS. I asked the Council to provide this information but this has not been provided.
HO28	Land at Admiral Jellicoe	8 completions	24	The site does not have planning permission and the Council has not provided clear evidence for its inclusion in the 5YHLS

Statement of Common Ground on Housing Land Supply – 10 January 2025

Ref:	Address	Status at 1 st April 2024 as set out in the AMR	No. of net dwellings in the 5YHLS disputed	Summary reason for dispute
	Extant planning permission at 1 st April 2024	Planning permission	119	Appendix 4 of the AMR lists 475 net dwellings, not 494 The Strategic allocations listed in the AMR are double counted in Appendix 4 and completions have not been removed from the figures. This means only 375 dwellings should be included from this source, not 494 – a reduction of 119 dwellings.
	SHLAA Policy Compliant & Expired Consents		36	The sites have not been identified and the Council has not provided clear evidence for their inclusion
	Brownfield Register		100	The sites have not been identified and the Council has not provided clear evidence for their inclusion
	Windfall allowance		180	The Council has not provided compelling evidence for a windfall allowance of 180 dwellings in addition to the windfall sites already included in the 5YHLS.
	Total		680	

2.3. The respective deliverable supply figures against the 5YHLS requirement are shown in the following table.

SOCG Table 2 – 5YHLS Positions at 1st April 2024

		Council	Appellant
	Requirement		
A	Annual local housing need	701	
B	5YHLS requirement without buffer (A X 5 years)	3,505	
C	5YHLS requirement plus 20% buffer (B + 20%)	4,206	
D	Annual 5YHLS requirement plus 20% (C / 5)	841	
	Supply		
E	5YHLS at 1 st April 2024	1,143	463
F	Supply in years (E / D)	1.36	0.55
G	Surplus / shortfall in 5YHLS (E – C)	-3,063	-3,743

[ENDS]