



castlepoint

benfleet | canvey | hadleigh | thundersley

**STRATEGIC HOUSING AND  
ECONOMIC LAND AVAILABILITY  
ASSESSMENT UPDATE**

November 2018

**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.

## **Content**

### **Volume 1: Report**

Introduction_____	Page 1-6
Planning Policy_____	Page 7-9
Study Methodology_____	Page 10-24
SHLAA Update Findings_____	Page 25-34
Applying the Findings of the SHLAA_____	Page 35-36
Conclusions and Recommendations_____	Page 37

### **Volume 2: Site Schedules**

Schedule A – Summary
Schedule B – Delivery Over Time
Schedule C – Capacity
Schedule D – Suitability
Schedule E – Achievability
Schedule F – Availability
Schedule G – Sites Added since 2013 Review
Schedule H – Sites Removed since 2013 Review

### **Volume 3: Mapping Report**

Overview Map
Maps of SHLAA Sites

### **Volume 4: Viability Report**

Porter Planning Economics – Development Viability Appraisals Report
---

# Volume 1: Report

## 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 - 2017 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 2018

- 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, local site knowledge, historic viability evidence and viability appraisals undertaken by PorterPE in 2018.
- 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. There have also been instances where site promoters have suggested a capacity based on their own work on site layout and design. Where this has not departed significantly from what the Council would expect to occur on such a site, the capacity proposed by site promoter has been used to identify the potential capacity.

- 1.8 The SHLAA Update is a snapshot in time, representing the situation as of November 2018. 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 67 of the National Planning Policy Framework (NPPF) 2018:

*“Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:*

*a) specific, deliverable sites for years one to five of the plan period; and*

*b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.*

- 1.18 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 no longer be viable, there is no longer a demand for the type of units or sites have long term phasing plans.

- 1.19 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.
- 1.20 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**

- 1.21 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**

- 1.22 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.
- 1.23 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).
- 1.24 A total of 494 sites were considered during the 2018 update work. The sites were considered in terms of their suitability, achievability (including viability assessed through historic viability evidence and by PorterPE’s Development Viability Appraisal which can be found in Volume 4) and availability, in accordance with the Planning Practice Guidance. Updating the 2017 SHLAA, the following work was undertaken:
- 85 sites were added to the assessment;
  - 37 sites were removed from the assessment because they had been completed in 2017/18;
  - 4 sites were removed from the assessment as the landowners no longer wanted the site considered within the SHLAA.
- 1.25 As a result 477 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	45	20	2	2	0	95	67	164
	Medium	26	33	5	2	0	121	64	187
	Low	1	1	0	0	0	2	2	4
GB PDL	High	4	3	0	0	0	0	7	7
	Medium	7	16	2	0	0	6	25	31
	Low	6	19	1	0	0	0	26	26
GB Partial	High	0	0	0	0	0	0	0	0
	Medium	9	0	0	0	0	0	9	9
	Low	3	0	0	0	0	6	3	9
GB Greenfield	High	2	0	0	0	0	0	2	2
	Medium	23	0	0	0	0	0	23	23
	Low	15	0	0	0	0	0	15	15
<b>TOTAL</b>	<b>High</b>	<b>51</b>	<b>23</b>	<b>2</b>	<b>2</b>	<b>0</b>	<b>95</b>	<b>76</b>	<b>173</b>
	<b>Medium</b>	<b>65</b>	<b>49</b>	<b>7</b>	<b>2</b>	<b>0</b>	<b>127</b>	<b>121</b>	<b>250</b>
	<b>Low</b>	<b>25</b>	<b>20</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>8</b>	<b>46</b>	<b>54</b>
	<b>ALL SITES</b>	<b>141</b>	<b>92</b>	<b>10</b>	<b>4</b>	<b>0</b>	<b>230</b>	<b>243</b>	<b>477</b>

**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	243	132	33	0	0	551	408	959
	Medium	568	479	165	0	0	222	1212	1434
	Low	0	39	0	0	0	21	39	60
GB PDL	High	20	0	0	0	0	0	20	20
	Medium	136	17	0	0	0	50	153	203
	Low	0	0	0	0	0	1305	0	1305
GB Partial	High	0	0	0	0	0	0	0	0
	Medium	365	158	0	0	0	179	523	702
	Low	26	0	0	0	0	147	26	173
GB Greenfield	High	11	12	0	0	0	0	23	23
	Medium	657	1246	450	230	0	15	2353	2598
	Low	19	230	199	0	0	755	448	1203
<b>Windfall</b>	<b>Windfall</b>	<b>0</b>	<b>100</b>	<b>100</b>	<b>0</b>	<b>0</b>	<b>N/A</b>	<b>200</b>	<b>200</b>
<b>TOTAL</b>	<b>High</b>	<b>274</b>	<b>144</b>	<b>33</b>	<b>0</b>	<b>0</b>	<b>551</b>	<b>451</b>	<b>1002</b>
	<b>Medium</b>	<b>1726</b>	<b>1900</b>	<b>615</b>	<b>230</b>	<b>0</b>	<b>466</b>	<b>4241</b>	<b>4937</b>
	<b>Low</b>	<b>45</b>	<b>269</b>	<b>199</b>	<b>0</b>	<b>0</b>	<b>2228</b>	<b>513</b>	<b>2741</b>
	<b>ALL SITES</b>	<b>2045</b>	<b>2313</b>	<b>847</b>	<b>230</b>	<b>0</b>	<b>3245</b>	<b>5405</b>	<b>8880</b>



- 1.26 Figure 1 shows that there are **197 sites** that are suitable (high or medium suitability) and are likely to come forward for development during the next 15 years.
- 1.27 Figure 2 shows that there are **sites with a capacity of 4,692 homes** that could be delivered on suitable (high or medium suitability) sites and have the potential to come forward for development during the next 15 years. In addition to this, there is the potential for a further 200 homes to come forward on windfall sites, with a potential **total capacity of 4,892 homes**.
- 1.28 However, it is unlikely that this total 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. As such a **risk assessment** has been prepared which indicates that the actual capacity is most likely to be in the region of **4,622 homes**.
- 1.29 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 **1,628 homes** could be delivered during the next 15 years. It should be noted that this includes homes which can be delivered from extant consents, and previously developed land within the Green Belt. This level of supply is insufficient in light of the need for housing identified by the Standard Method set out in the National Planning Policy Framework and associated Planning Practice Guidance, which based on 2014 CLG Household Projections indicates a requirement for 342 homes per annum.

## 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 revised National Planning Policy Framework (NPPF) published in July 2018, sets out the Government's policies for planning in England. The NPPF (2018) brings brevity to national planning policy by reducing the previous suite of PPGs and PPSs to a single document of 73 pages. At the heart of the NPPF (2018) is a *presumption in favour of sustainable development*. Paragraph 11 of the NPPF (2018) defines the implications of this presumption for plan making:

a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

ii. 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.

- 2.3 Further policy guidance is also provided in the NPPF (2018) 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.

- 2.4 Paragraph 72 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 (2018) expects that new settlements or extensions to existing towns should follow the principles of Garden Cities.

- 2.5 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***

2.6 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

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

### **Existing Local Policy**

2.8 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.

2.9 On the 2 April 2013 a report was published by the Council assessing extant Local Plan policies against their conformity with the NPPF (2012). This was to be compliant with Paragraph 215 of the NPPF (2012) which states that from 27 March 2013, due weight should be given to policies within existing Local Plans according to their degree of consistency with the NPPF (2012).

2.10 Policy H2 of the Local Plan states that land allocated for residential purposes within the Local Plan shall be retained primarily for that purpose.

2.11 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.

2.12 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 are however 2 applications submitted by the owners of the Thorney Bay Caravan site for redevelopment for housing which are under consideration. The Thorney Bay Caravan Park is therefore considered as two separate housing sites in this assessment.

2.13 Policy H5 safeguards land for long term housing needs off Kiln Road in Thundersley. The majority of this site has been completed with 150 homes. The remaining portion of this site has commenced for 71 homes, 17 of which

have been completed in this reporting year (2016/2017). This remaining part of the site is therefore considered within this assessment.

- 2.14 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.
- 2.15 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.
- 2.16 Policy H13 expects flats and sheltered accommodation to be located on or near a main road.
- 2.17 Policy H14 permits residential development above existing commercial properties.
- 2.18 Policy H17 provides a link to the Council's residential design standards set out in Appendix 12 of the Local Plan. As of January 1 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.
- 2.19 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.
- 2.20 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**

- 2.21 During the period of this SHLAA (2017/2018) the Council is preparing a New Local Plan. As this was not sufficiently advanced at the time this SHLAA was prepared, it has been prepared based on the policy requirements of the 1998 Adopted Local Plan.

### 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 2018.

#### 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 currently available at this time. Work is underway to better evidence base work across these five districts, however for the purposes of this SHLAA 2018 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 - 2017 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 and economic 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 2018 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 consultations on the draft New Local Plan 2014 (January – March 2014) and New Local Plan 2016 (May – June 2016); and
  - Any other potential housing sites known to the Council.
- 3.6 The 2018 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 proforma 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 proforma 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 **Call for Sites 2018:** The Council undertook a call for sites in 2018 to identify further sites for housing within the Borough as well as to ensure the availability status of the sites were up-to-date. The Call for Sites was publicised through the website along with direct mailings to existing site promoters within the SHLAA.
- 3.8 **Other site uses:** This SHLAA has also considered land put forward in this update for other uses such as for employment or educational use.
- 3.9 **Site Survey:** Where a site has previously been included in the SHLAA, the site survey primarily focuses on updating existing information.
- 3.10 Representations were received by the Council in respect of each of the strategic housing sites identified in the draft New Local Plan 2014 and New Local Plan 2016, and those 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.
- 3.11 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.

3.12 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.

3.13 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**

3.14 ***Estimating the 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;
- Where a site was submitted through the Call for Sites 2018, the capacity proposed as part of the submission was used where considered feasible;
- 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.
- In terms of sites within employment areas, the site was only considered suitable for that use.
- There have not been any sites promoted for Gypsy and Traveller occupation use throughout the SHLAA process to date.

3.15 The potential housing capacity of each site was reviewed in 2018 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

3.16 **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.



3.17 **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 (2018).
- **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 Council’s Environmental Health Service has identified a number of locations within the borough where NO<sub>x</sub> 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 (2018) 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 (2018) 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. 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 2014 and New Local Plan 2016. 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 2014 and New Local Plan 2016 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 (2018) 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 minute 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.

- 3.18 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.
- 3.19 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.
- 3.20 **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:
- **Call for Sites 2018** – as part of the Call for Sites 2018 process, existing landowners who had sites within the SHLAA were contacted to identify whether their site(s) were still to be considered available, the relevant information was updated accordingly.
  - **The site promoter** – the Planning Practice Guidance 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 (2018). 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.

3.21 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.

3.22 **Assessing the Achievability of each Site / Broad Location** – Porter Planning Economics Ltd (PorterPE) have undertaken Sites Development Viability Appraisals which can be viewed in Volume 4. The appraisals:

- Confirms the economic viability of all sites identified by the Council as being, in principle, suitable and available for residential or mixed-use development in the SHLAA, taking into consideration the current economic climate and costs that will be associated with residential development;
- Meets the criteria contained in the NPPF (2018) and Planning Practice Guidance in assessing the achievability of sites, by considering market conditions.

3.23 In addition to the viability appraisals, historic viability evidence has been used that indicates that development in the Thundersley area, especially on greenfield sites, is most likely to be viable. There is recent evidence of speculative planning applications being made for such sites, adding to the evidence that this is the case

3.24 **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.

- 3.25 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 2018. For those that are considered to be developable ‘within five to ten years’ the lead in times are applied to April 2023, and for those that are considered to be developable ‘within ten to fifteen years’ the lead in times are applied to April 2028. 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 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.

- 3.26 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.
- 3.27 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.

- 3.28 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.
- 3.29 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.
- 3.30 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**

- 3.31 A Council is permitted by paragraph 70 of the NPPF (2018) to include a windfall allowance in their calculations of housing land supply where there is compelling evidence that they will provide a reliable source of 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.
- 3.32 Castle Point has historically achieved supply from small sites which are unpredictable in their availability and difficult to capture in a site specific assessment. In the ten year period from 2008 to 2018, an average of 33 homes per annum has been delivered on these sites, this is shown in Figure 7 below.

**Figure 7: Windfall Delivery Rates in the Past 10 Years**

Year	Net Additional dwellings	On Sites of 10 units or less
2017/18	150	67
2016/17	114	70
2015/16	123	35
2014/15	202	22
2013/14	45	28
2012/13	75	29
2011/12	50	19

3.33 As part of the assessment work for this SHLAA, a number of small sites have been identified for consideration. However, at this time their availability is not known. These sites have a capacity of 395 homes. Over a 10 year period it is therefore possible to assume at future delivery on unspecified small sites will continue, and that there is identified potential capacity in this regard which would suggest a that delivery on small sites might continue at a rate of around 20 homes per year. The PPG states that any windfall allowance may be justified in the 5-year supply if a local planning authority has compelling evidence, in this instance it is considered that years 6-15 would be more likely to provide a windfall allowance (Paragraph: 24 Reference ID: 3-24-20140306). On this basis, it is recommended that a windfall assessment be applied to account for this supply at a rate of 20 homes per annum from years 6-15. This is potentially a conservative estimate.

**Stage 4: Assessment Review**

3.33 **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 (2018) 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.

3.35 **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. 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 5 applications for housing have expired each year with an average



capacity of 6 homes lost from the supply each year. It is therefore considered appropriate to conclude that around 6 homes 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 30 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** –sites on Canvey Island are not usually as viable as schemes in Benfleet. Additionally, flatted developments tend to 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.

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

3.37 **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.

### **Stage 5: Final Evidence Base**

- 3.38 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 (2018).
- 3.39 **Objectively Assessed Need** - In terms of housing need, the NPPF (2018) expects local planning authorities to meet their full objectively assessed need for housing. The Planning Practice Guidance sets out a standard methodology for the calculation of housing need, using the sub-national Household Projections, adjusted to account for market conditions. At the 31 August, the 2014 based subnational household projections were the most up to date set of household projections available, and these were adjusted in accordance with the standard method using the 2017 workplace based affordability ratios. This gives rise to a need for 342 homes per annum in Castle Point. In accordance with Government advice, the calculation of housing need has not been updated in respect of the 2016 based subnational household projections.
- 3.41 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 South Essex Strategic Housing Market Assessment Addendum 2017 indicates that provision in line with OAN would require between 56% and 60% of new homes per annum across the housing market area to be affordable in order to meet the need for affordable housing.
- 3.42 **Supply Buffer** – Paragraph 73 of the NPPF (2018) 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.
- 3.43 In the period since 2011, Castle Point Borough Council has considered various evidence in relation to housing need. Throughout this period, the level of need has consistently been identified as siting in excess of 200 homes per annum. During the period since 2011, housing delivery within Castle Point has only exceeded 200 homes in a year on one occasion. There has therefore 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 342 homes – 68 homes per annum.

- 3.44 ***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.
- 3.45 The three trajectories (overall trajectory, risk assessed trajectory, and current 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 477 sites was assessed. 173 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 1,002 homes.
- 4.4 A further 250 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 4,927 homes.
- 4.5 There were 54 sites 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 2,711 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 *Sites Development Viability Appraisals* carried out by PorterPE in 2018 and historic viability knowledge about the Borough.

### Viability

- 4.8 The findings show that most (86%) of the tested SHLAA sites in the *Sites Development Viability Appraisals* (2018), accounting for around 89% of the potential total dwellings (4,198 dwellings), would be viable with full policy requirements under today's market conditions. A further 2 sites accounting for 30 units are marginally viable (i.e. their RLV is within 10% higher or lower than the BLV), which means they could potentially become viable if there are small changes in market conditions or policy requirements are slightly relaxed.

- 4.9 In total, therefore, 89% of sites, accounting for 4,228 dwellings have the potential to help meet demand by providing the immediate future housing supply of dwellings, subject to planning. Or more precisely, these can be considered capable of contributing to the five-year land supply in line with current national guidance.
- 4.10 The eight sites, with 478 potential dwellings that are identified by the viability assessment to be unviable, whereby the residual value is below the assumed benchmark market land value, are not necessarily unviable. It may well be that the particular circumstances of acquisition / ownership mean that their benchmark value is different, and / or there would be more likelihood for these sites to come back during the planning process to reduce the burden of affordable housing and / or other s106 obligations.
- 4.11 Two of the eight sites have been identified, through local knowledge, to be devoid of any land purchase costs as the land was purchased a substantial time ago and does not therefore impede future delivery. This brings two further sites into the achievable category (S0035 – East of Canvey Road and S0398 Kings Park, both Canvey Island) providing an additional 325 dwellings.
- 4.12 Historic viability evidence about the Castle Point Borough identified a further 24 sites which would be considered as achievable. These sites would have the capacity to provide a further 850 dwellings. This would take the total capacity to 5,078 dwellings on 97 sites having the potential to meet demand by providing the immediate future housing supply of dwellings, subject to planning.
- 4.13 A number of schemes also promote flatted development within Canvey Island which historic viability data has indicated as being unviable. However, recent data about completions of flatted development in Canvey Island over the last five years does not show this to be the case. Figure 8 below shows the delivery over the last five years:

**Figure 8: Flatted Development Completions on Canvey Island in the last Five Years**

Year	Flats built
2012/13	0
2013/14	14
2014/15	80
2015/16	8
2016/17	46

### **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. Other sites are occupied by businesses still in operation. As such these are not currently available and have been removed from calculations of supply.
- 4.12 Overall, there are 247 sites with a capacity of 5,205 homes that are considered to be available for housing, of which it is expected that 5,160 homes can be delivered within the next 15 years on 243 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 2,045 homes, a maximum housing supply capacity for years 5 to 10 of 2,313 homes and a maximum housing supply capacity for years 10 to 15 of 802 homes. It is thought a further 230 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 9 shows the maximum housing potential for Castle Point identified through this SHLAA Update. It shows the capacity of all achievable sites and the phasing of that capacity over time. The maximum housing potential for Castle Point is 4,692 homes over the next 15 years, with an additional potential for 230 homes to be delivered beyond that period.

**Figure 9: 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	243	132	33	0	0	551	<b>408</b>	<b>959</b>
	Medium	568	479	165	0	0	222	<b>1212</b>	<b>1434</b>
	Low	0	39	0	0	0	21	<b>39</b>	<b>60</b>
GB PDL	High	20	0	0	0	0	0	<b>20</b>	<b>20</b>
	Medium	136	17	0	0	0	50	<b>153</b>	<b>203</b>
	Low	0	0	0	0	0	1305	<b>0</b>	<b>1305</b>
GB Partial	High	0	0	0	0	0	0	<b>0</b>	<b>0</b>
	Medium	365	158	0	0	0	179	<b>523</b>	<b>702</b>
	Low	26	0	0	0	0	147	<b>26</b>	<b>173</b>
GB Greenfield	High	11	12	0	0	0	0	<b>23</b>	<b>23</b>
	Medium	657	1246	450	230	0	15	<b>2353</b>	<b>2598</b>
	Low	19	230	199	0	0	755	<b>448</b>	<b>1203</b>
<b>Windfall</b>	<b>Windfall</b>	<b>0</b>	<b>100</b>	<b>100</b>	<b>0</b>	<b>0</b>	<b>N/A</b>	<b>200</b>	<b>200</b>
<b>TOTAL</b>	<b>High</b>	<b>274</b>	<b>144</b>	<b>33</b>	<b>0</b>	<b>0</b>	<b>551</b>	<b>451</b>	<b>1002</b>
	<b>Medium</b>	<b>1726</b>	<b>1900</b>	<b>615</b>	<b>230</b>	<b>0</b>	<b>466</b>	<b>4241</b>	<b>4937</b>
	<b>Low</b>	<b>45</b>	<b>269</b>	<b>199</b>	<b>0</b>	<b>0</b>	<b>2228</b>	<b>513</b>	<b>2741</b>
	<b>ALL SITES</b>	<b>2045</b>	<b>2413</b>	<b>748</b>	<b>230</b>	<b>0</b>	<b>3245</b>	<b>5405</b>	<b>8880</b>

4.20 Figures 10 to 13 show the distribution of the maximum housing potential of suitable sites by ward and by town. 13% of the supply is located in Benfleet, 53% on Canvey Island, 15% in Hadleigh and 8% in Thundersley.

**Figure 10: 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	47	23	4	0	0	32	<b>74</b>	<b>106</b>
	GB PDL	12	5	0	0	0	0	<b>17</b>	<b>17</b>
	GB Partial	0	0	0	0	0	0	<b>0</b>	<b>0</b>
	GB Greenfield	45	130	0	0	0	0	<b>175</b>	<b>175</b>
Boyce	Non GB	97	1	6	0	0	48	<b>104</b>	<b>152</b>
	GB PDL	119	0	0	0	0	0	<b>119</b>	<b>119</b>
	GB Partial	115	16	0	0	0	35	<b>131</b>	<b>166</b>
	GB Greenfield	49	18	100	0	0	2	<b>167</b>	<b>169</b>
St. Marys	Non GB	37	18	0	0	0	29	<b>55</b>	<b>84</b>
	GB PDL	0	0	0	0	0	0	<b>0</b>	<b>0</b>
	GB Partial	0	0	0	0	0	0	<b>0</b>	<b>0</b>
	GB Greenfield	145	430	150	0	0	0	<b>725</b>	<b>725</b>
<b>BENFLEET TOTAL</b>	<b>Non GB</b>	<b>181</b>	<b>42</b>	<b>10</b>	<b>0</b>	<b>0</b>	<b>109</b>	<b>233</b>	<b>342</b>
	<b>GB PDL</b>	<b>131</b>	<b>5</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>136</b>	<b>136</b>
	<b>GB Partial</b>	<b>115</b>	<b>16</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>35</b>	<b>131</b>	<b>166</b>
	<b>GB Greenfield</b>	<b>239</b>	<b>578</b>	<b>250</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>1067</b>	<b>1069</b>
	<b>ALL SITES</b>	<b>666</b>	<b>641</b>	<b>260</b>	<b>0</b>	<b>0</b>	<b>146</b>	<b>1567</b>	<b>1713</b>



**Figure 11: 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	34	64	0	0	0	39	<b>98</b>	<b>137</b>
	GB PDL	0	0	0	0	0	0	<b>0</b>	<b>0</b>
	GB Partial	0	0	0	0	0	0	<b>0</b>	<b>0</b>
	GB Greenfield	0	0	0	0	0	0	<b>0</b>	<b>0</b>
Canvey Island East	Non GB	68	37	37	0	0	20	<b>142</b>	<b>162</b>
	GB PDL	0	0	0	0	0	0	<b>0</b>	<b>0</b>
	GB Partial	0	0	0	0	0	0	<b>0</b>	<b>0</b>
	GB Greenfield	0	0	0	0	0	0	<b>0</b>	<b>0</b>
Canvey Island North	Non GB	15	0	1	0	0	28	<b>16</b>	<b>44</b>
	GB PDL	0	0	0	0	0	0	<b>0</b>	<b>0</b>
	GB Partial	50	0	0	0	0	0	<b>50</b>	<b>50</b>
	GB Greenfield	0	0	0	0	0	0	<b>0</b>	<b>0</b>
Canvey Island South	Non GB	289	266	117	0	0	74	<b>672</b>	<b>746</b>
	GB PDL	0	0	0	0	0	0	<b>0</b>	<b>0</b>
	GB Partial	0	0	0	0	0	0	<b>0</b>	<b>0</b>
	GB Greenfield	0	0	0	0	0	0	<b>0</b>	<b>0</b>
Canvey Island West	Non GB	0	17	0	0	0	22	<b>17</b>	<b>39</b>
	GB PDL	0	12	0	0	0	50	<b>12</b>	<b>62</b>
	GB Partial	0	0	0	0	0	0	<b>0</b>	<b>0</b>
	GB Greenfield	27	0	45	230	0	0	<b>72</b>	<b>302</b>
Canvey Island Winter Gardens	Non GB	20	10	5	0	0	9	<b>35</b>	<b>44</b>
	GB PDL	0	0	0	0	0	0	<b>0</b>	<b>0</b>
	GB Partial	0	0	0	0	0	0	<b>0</b>	<b>0</b>
	GB Greenfield	0	0	0	0	0	0	<b>0</b>	<b>0</b>
<b>CANVEY ISLAND TOTAL</b>	<b>Non GB</b>	<b>426</b>	<b>394</b>	<b>160</b>	<b>0</b>	<b>0</b>	<b>192</b>	<b>980</b>	<b>1172</b>
	<b>GB PDL</b>	<b>0</b>	<b>12</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>50</b>	<b>12</b>	<b>62</b>
	<b>GB Partial</b>	<b>50</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>50</b>	<b>50</b>
	<b>GB Greenfield</b>	<b>27</b>	<b>0</b>	<b>45</b>	<b>230</b>	<b>0</b>	<b>0</b>	<b>72</b>	<b>302</b>
	<b>ALL SITES</b>	<b>503</b>	<b>406</b>	<b>205</b>	<b>230</b>	<b>0</b>	<b>242</b>	<b>1114</b>	<b>1586</b>

**Figure 12: 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	141	88	0	0	0	112	229	341
	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	2	32	0	0	0	33	34	67
	GB PDL	5	0	0	0	0	0	5	5
	GB Partial	0	0	0	0	0	112	0	112
	GB Greenfield	150	476	155	0	0	13	781	794
<b>HADLEIGH TOTAL</b>	<b>Non GB</b>	<b>143</b>	<b>120</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>145</b>	<b>263</b>	<b>408</b>
	<b>GB PDL</b>	<b>5</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>5</b>	<b>5</b>
	<b>GB Partial</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>112</b>	<b>0</b>	<b>112</b>
	<b>GB Greenfield</b>	<b>150</b>	<b>476</b>	<b>155</b>	<b>0</b>	<b>0</b>	<b>13</b>	<b>781</b>	<b>794</b>
	<b>ALL SITES</b>	<b>298</b>	<b>596</b>	<b>155</b>	<b>0</b>	<b>0</b>	<b>270</b>	<b>1049</b>	<b>1319</b>

**Figure 13: 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	18	39	28	0	0	30	85	115
	GB PDL	0	0	0	0	0	0	0	0
	GB Partial	121	140	0	0	0	0	261	261
	GB Greenfield	105	0	0	0	0	0	105	105
St. Georges	Non GB	1	0	0	0	0	15	1	16
	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	42	16	0	0	0	282	58	340
	GB PDL	20	0	0	0	0	0	20	20
	GB Partial	79	2	0	0	0	32	81	113
	GB Greenfield	7	204	0	0	0	0	211	211
<b>THUNDERSLEY TOTAL</b>	<b>Non GB</b>	<b>61</b>	<b>55</b>	<b>28</b>	<b>0</b>	<b>0</b>	<b>327</b>	<b>144</b>	<b>471</b>
	<b>GB PDL</b>	<b>20</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>20</b>	<b>20</b>
	<b>GB Partial</b>	<b>200</b>	<b>142</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>32</b>	<b>342</b>	<b>374</b>
	<b>GB Greenfield</b>	<b>252</b>	<b>204</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>456</b>	<b>456</b>
	<b>ALL SITES</b>	<b>533</b>	<b>401</b>	<b>28</b>	<b>0</b>	<b>0</b>	<b>359</b>	<b>962</b>	<b>1321</b>

## 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 270 homes.

**Figure 14: Risk Assessment of Housing Capacity**

Risk Factor	Availability			TOTAL
	0 to 5 Years	5 to 10 Years	10 to 15 Years	
<b>Total Capacity</b>	<b>2,000</b>	<b>2,144</b>	<b>748</b>	<b>4,892</b>
Expired Applications	30	0	0	30
One for One Replacements	10	10	10	30
Redevelopment for Non-residential Use	60	60	60	180
Viability	27	3	0	30
<b>Risk Assessed Capacity</b>	<b>1,873</b>	<b>2,071</b>	<b>678</b>	<b>4,622</b>

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

- 4.22 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 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 15: Housing Capacity Available in Accordance with 1998 Adopted Local Plan**

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	181	42	10	236	13%
	Green Belt with PP	0	3	0		
Canvey	Non Green Belt	426	394	160	980	53%
	Green Belt with PP	0	0	0		
Hadleigh	Non Green Belt	143	120	0	271	15%
	Green Belt with PP	8	0	0		
Thundersley	Non Green Belt	61	55	28	144	8%
	Green Belt with PP	0	0	0		
<i>Windfall</i>	<i>Windfall</i>	0	100	100	200	11%
Borough-wide	Non Green Belt	811	611	198	1,620	100%
	Green Belt with PP	8	0	0	8	0%
	<b>TOTAL</b>	<b>819</b>	<b>711</b>	<b>298</b>	<b>1,828</b>	

4.23 ***Economic Land identification:*** A small number of sites were put forward by landowners whose land was located within existing well-established employment areas. These eight sites were located within the Manor Trading Estate, Thundersley. In total they equate to approximately 5.8ha of economic land (See Figure 16 below). These sites were not considered for residential development based on their location.

**Figure 16: Economic Land Site Availability**

<b>New Reference</b>	<b>Name</b>	<b>Size (ha)</b>	<b>Comments on Availability</b>	<b>Current Policy Designation</b>
S0147	Manor Trading Estate, West of Fulton & Armstrong Road, Thundersley	1.8	Not all landowners came forward to advise that the site is available as part of the Call for Sites 2018, therefore site is unavailable.	Employment
S0148	Manor Trading Estate, West of Fulton & Armstrong Road, Thundersley	0.83	Landowners responded to Fact Checking 2018 exercise and confirmed the site can be considered as available. Site is in an existing employment area on only suitable for employment use.	Employment
S0149	Manor Trading Estate, West of Fulton & Armstrong Road, Thundersley	0.05	Landowner responded to Fact Checking 2018 exercise and confirmed the site can be considered as available. Site is in an existing employment area on only suitable for employment use.	Employment
S0237	Manor Trading Estate, West of Armstrong Road, Thundersley	0.57	Landowners responded to Fact Checking 2018 exercise and confirmed the site can be considered as available. Site is in an existing employment area on only suitable for employment use.	Employment
S0243	Manor Trading Estate, East of Armstrong Road, Thundersley	3.67	Landowners responded to Fact Checking 2018 exercise and confirmed the site can be considered as available. Site is in an existing employment area on only suitable for employment use.	Employment
S0244	Manor Trading Estate, East of Armstrong Road, Thundersley	0.18	Landowners responded to Fact Checking 2018 exercise and confirmed the site can be considered as available. Site is in an existing employment area on only suitable for employment use.	Employment
S0245	Manor Trading Estate, East of Armstrong Road, Thundersley	0.4	Landowners responded to Fact Checking 2018 exercise and confirmed the site can be considered as available. Site is in an existing employment area on only suitable for employment use.	Employment
S0367	Manor Trading Estate, West of Armstrong Road, Thundersley	0.13	Landowners responded to Fact Checking 2018 exercise and confirmed the site can be considered as available. Site is in an existing employment area on only suitable for employment use.	Employment

## 5. Applying the Findings of the SHLAA

### Comparison with Housing Requirements

- 5.1 On 3 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 the NPPF (2018) to use evidence to establish their own housing target based on the full, objectively assessed need for market and affordable housing.
- 5.2 Paragraph 67 of the NPPF (2018) 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 The Standard Method set out in the NPPF (2018) and associated Planning Practice Guidance, which is based on 2014 CLG Household Projections, identifies a higher requirement of 342 homes per annum.

### Objectively Assessed Housing Need

- 5.4 At 342 homes per annum the objectively assessed housing need identified through the NPPF (2018) Standard Method gives rise to a requirement for 5,472 homes over the next 15 year period. Figure 17 shows the distribution of the requirement over time with the proposed new Local Plan period starting at 2018.

Figure 17: Objectively Assessed Need Over Time

Period	Initial Requirement	% Buffer	Buffer	Total Requirement	Annual Requirement
0 to 5 Years (2018 – 2023)	1,710	20%	342	2,052	410
5 to 10 Years (2023 – 2028)	1,710	0%	0	1,710	342
10 to 15 Years (2028 – 2033)	1,710	0%	0	1,710	342

Figure 18: 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	2,052	1,710	1,710	5,472
Supply	2,000	2,144	748	4,892
Difference	-52	434	-962	-580
% Difference	98%	125%	44%	89%
Supply in Years	<b>4.9</b>			

**Figure 19: Comparison between Objectively Assessed Need and Trajectory 2 – Risk Assessed Potential Supply**

	<b>0 to 5 Years</b>	<b>5 to 10 Years</b>	<b>10 to 15 Years</b>	<b>TOTAL</b>
<b>Requirement</b>	2,052	1,710	1,710	5,472
<b>Supply</b>	1,873	2,071	678	4,622
<b>Difference</b>	-179	361	-1,032	-850
<b>% Difference</b>	91%	121%	40%	85%
<b>Supply in Years</b>	<b>4.6</b>			

**Figure 20: Comparison between Objectively Assessed Need and Trajectory 3 – 1998 Adopted Local Plan Policy**

	<b>0 to 5 Years</b>	<b>5 to 10 Years</b>	<b>10 to 15 Years</b>	<b>TOTAL</b>
<b>Requirement</b>	2,052	1,710	1,710	5,472
<b>Supply</b>	891	711	298	1,828
<b>Difference</b>	-1,161	-999	-1,412	-3,644
<b>% Difference</b>	43%	42%	17%	33%
<b>Supply in Years</b>	<b>2.2</b>			

- 5.5 Figure 18 shows, that if the potential maximum housing supply in Castle Point was fully realised there is insufficient identified supply within Castle Point to achieve the objectively assessed need for housing. Overall, the capacity of potential housing sites is 11% below the overall housing requirement. However, there would be only a small insufficient supply to meet the five year housing land supply (2% deficit)
- 5.6 When risk factors are taken into account, the potential supply is 15% below the required need, as demonstrated by figure 19.
- 5.7 Figure 20 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 less than the objectively assessed need, and as such there would be a deficit of supply of 67%. It should be noted that there is a higher deficit of supply in years 0 to 5 (i.e. the five year housing land supply) of 43%. As policy currently stands supply sits at just 2.2 years, and not the 5 years required.

## **6. Conclusions**

- 6.1 Paragraph 11 of the NPPF (2018) 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 OAN for housing. Indeed, this only delivers 33% of the necessary housing supply over the period to 2033, and only provides for 2.2 years of deliverable supply.
- 6.3 The SHLAA indicates that there is however a supply of land within the borough to accommodate a significant proportion of the objectively assessed need for housing, however much of this supply is constrained by Green Belt. There is therefore a need for the Council to consider and determine whether housing need, and any other relevant factors give rise to the exceptional circumstances required by the NPPF in order to amend Green Belt boundaries. A separate Green Belt Topic Paper (2018) has been prepared to consider this matter in more detail. However, the evidence in this report indicates that there is potentially an acute need to review such boundaries, given an inherent constraint on supply arising from the urban area.