Town and Country Planning Act 1990
Planning and Compulsory Purchase Act 2004

# Land East of Rayleigh Road Thundersley

**Section 78 Appeal by This Land Development Limited** 

**Housing Need Appendices** 

Proof of Evidence of James Donagh BA (Hons), MCD, MIED

Appeal Ref: APP/M1520/W24/3338797

LPA: 23/0085/OUT

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# **Appendix 1: Housing Needs and Demographic Report, STANTEC, 2024**



# CASTLE POINT HOUSING NEEDS AND DEMOGRAPHIC REPORT

In relation to land east of Rayleigh Road, Thundersley

7 May 2024

Prepared for: This Land Development Limited

Prepared by: Stantec Development Economics

#### Castle Point Housing Needs and Demographic Report

Revision	Description	Author	Date	<b>Quality Check</b>	Date
1	Draft	RB	17/03/2024	JD	17/03/2024
2	2 <sup>nd</sup> draft	RB	22/04/2024	JD	23/04/2024
3	Final draft	RB	29/04/2024	JD	29/04/2024
4	FINAL	RB	03/04/2024	JD	07/05/2024

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## **Executive Summary**

- This report has been prepared by Stantec Development Economics on behalf of This Land Limited.
- ii. The report reviews the housing and demographic context of Castle Point, Essex. This is in relation to a development of up to 455 new homes proposed on land east of Rayleigh Road, Thundersley. The site is on designated Green Belt land.
- iii. The site was allocated in a local plan which was found to be sound, however this plan was withdrawn and not adopted following a change of administration.
- iv. Based on the government's standard method, housing need in Castle Point is 349 dwellings per year.

#### **Local Evidence Base**

- v. A South Essex Housing Needs Assessment (HNA) was produced by Turley in 2022.
- vi. The HNA found that housing delivery across South Essex lagged the East of England and the nation, whereas house price growth had been relatively high. Castle Point saw the lowest rate of housing growth.
- vii. Population growth was slow across South Essex, and had fallen more quickly than in the region and nation as a whole. Castle Point had particularly slow population growth, with deaths exceeding birth in contrast to the rest of the sub-region.
- viii. It concluded that standard method provided a reasonable estimate for housing need across South Essex and did not identify exceptional circumstances which justify lower delivery in any of the six authorities.
- ix. ORS was commissioned by Castle Point Borough Council in 2023 to produce a Local Housing Needs Assessment (LHNA) for Castle Point.
- x. The 2023 LHNA did not use the standard method, instead calculating housing need with reference to 2018-based household projections and a non-standard affordability uplift. This resulted in an estimated housing need of 255, significantly lower than the standard method's 349.
- xi. ORS argue that Castle Point has exceptional circumstances which justify lower housing delivery. This argument focuses on revisions to population figures (especially unattributable population change, UPC).
- xii. Our analysis finds that the revision to mid-year estimates made for Castle Point following Census 2021 was not unusual in the national context. The difference between Census 2021 and MYE 2020 for Castle Point was -1.035%; the 218th-highest of 309 English local authorities. This was also quite close to the England-wide figure of -0.106%.

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## **Demographic and Housing Context**

- xiii. Analysis of demographic and housing data updates similar work in the South Essex HNA, and finds that its conclusions still hold: Castle Point is experiencing slow population growth (and this is expected to continue), rate of housing additions has continued to be low; and housing affordability continues to be poor.
- xiv. An interesting finding not in the South Essex HNA is that a large proportion of Castle Point households live in caravans or other mobile or temporary structures. Whilst this may be driven by choice to some extent, it is indicative of affordable housing being in short supply.
- xv. High home ownership rates in Castle Point appear positive, but household formation rates are low, especially among the younger age groups who might be expected to be first-time buyers. This suggests that these younger residents struggle to form households (of any tenure) at all.

## **Affordable Housing Need**

- xvi. This section reviews and compared estimates of affordable housing need in Turley 2022 and ORS 2023.
- xvii. The two assessments produced rather similar estimates of gross affordable housing need over the plan period. The ORS estimate of *net* need, however, was much lower.
- xviii. This difference was a result of differing assumptions on future affordable housing supply and changes in demand i.e. how many affordable homes would be vacated each year (as a result of death or out-migration) and how many households would climb out of affordable housing need.
- xix. We consider the Turley 2022 figures, which draw heavily on historic data supplied by councils and modelling which assumes standard method housing need is met, to be a more robust estimate.
- xx. The needs of households who aspire to home ownership (but cannot afford it), i.e. via the provision of affordable routes to ownership, are also included in ORS 2023 (there are no comparable figures in Turley 2022).
- xxi. We consider these estimates to be overly cautious, mainly because affordable ownership options other than First Homes are not explicitly considered and the prices used for 3- and 4+-bedroom homes appear to be very high.
- xxii. Considering historic loss rates of affordable housing stock, and historic/targeted delivery, achieving the affordable housing need estimated by Turley (which we consider to be stronger) would require comfortably exceeding standard method housing need overall.

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#### 1 Introduction

- 1.1 This report has been prepared by Stantec Development Economics on behalf of This Land Limited.
- 1.2 The report reviews the housing and demographic context of Castle Point, Essex. This is in relation to a development of up to 455 new homes proposed on land east of Rayleigh Road, Thundersley. The site is on designated Green Belt land.
- 1.3 The site was allocated in a local plan which was found to be sound, however this plan was withdrawn and not adopted following a change of administration.
- 1.4 To that end, the report is structured as follows:
  - Policy Context, setting out relevant local and national policy and guidance.
  - Assessment Area, mapping the site within Castle Point.
  - Standard Method Housing Need, for Castle Point and the rest of South Essex.
  - Local Evidence Base, reviewing the South Essex HNA produced by Turley in 2022 and the Castle Point LHNA produced by ORS in 2023.
  - Demographic and Housing Context, analysing key up-to-date data on the area, its current situation, and drivers of need.
  - Affordable Housing Need, reviewing and comparing in detail Turley and ORS estimates of the need for affordable housing, and implications for overall need.
  - An appendix discussing the national housing crisis and policy.



## 2 Policy Context

## **National Planning Policy Framework**

- 2.1 The National Planning Policy Framework (NPPF)¹ (last revised in 2023) sets out the Government's planning policies for England and how these are expected to be applied. It must be taken into account in the preparation of development plans (for instance local and neighbourhood plans), and applications for planning permission are then required to be determined in accordance with these plans.
- 2.2 The Framework contains a presumption in favour of sustainable development (paragraph 11). This requires that policies provide for objectively assessed need for housing at a minimum, and that proposals in accordance with up-to-date plans be approved without delay. Where no up-to-date plan is in place, permission should be granted unless policies in the Framework provide a clear reason for refusal, or adverse impacts would significantly and demonstrably outweigh the benefits.
- 2.3 One of the policies protecting areas or assets of particular importance concerns land designated as Green Belt and is therefore relevant to the proposed development east of Rayleigh Road, Thundersley.
- 2.4 Chapter 5, Delivering a sufficient supply of homes, states that (paragraph 60):

'To support the government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community.'

- Overall housing need should be informed by the government's standard method; only in exceptional circumstances would an alternative approach (i.e. one generating a lower level of need) be justified, and this would also need to reflect current and future demographic trends and market signals. The standard method and policy concerning its use are discussed in more detail later in this report.
- 2.6 Paragraph 63 gives examples of groups in the community whose housing need should be assessed and reflected in planning policies. These include those who require affordable housing.
- 2.7 Planning Practice Guidance (PPG)<sup>2</sup> provides some guidance on how affordable housing need should be calculated and discusses potential implications for overall housing needs: 'The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing requirement included in the plan may need to be considered where it could help deliver the required number of affordable homes.'

<sup>&</sup>lt;sup>2</sup> Housing needs of different groups - GOV.UK (www.gov.uk)



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<sup>&</sup>lt;sup>1</sup> National Planning Policy Framework - Guidance - GOV.UK (www.gov.uk)

## **Local planning policy**

- 2.8 The Castle Point Local Plan (2018-2033)<sup>3</sup> was submitted for examination in October 2020, found sound in March 2022<sup>4</sup>, and withdrawn in June 2022, following local elections which changed the political balance of the council.
- 2.9 The local plan which was found sound but then withdrawn included a housing requirement of 5,325 dwellings over the plan period (calculated using the standard method) and several new housing allocations in the Green Belt. CPBC's capacity assessment had found that only around 53% of the housing need could be met within the urban area, so alteration of Green Belt boundaries would be required to meet housing need. At the time, the Council did not dispute the standard method figure and were not proposing a lower housing need figure than the 355 homes per annum indicated by it.
- 2.10 The key target for affordable housing delivery was 40% on developments of 10 units or more (with lower rates of 15-40% on Canvey Island).
- 2.11 At a meeting on the 23<sup>rd</sup> of March 2022 (prior to the local elections), CPBC voted to postpone the local plan.<sup>5</sup> The motion carried was:

We call on the Council to stop and assess the recent announcements made by the Conservative Government and the new Secretary of State Michael Gove with regard to changes to the planning system (and take whatever action is necessary) to protect and preserve the precious green belt in our local area and reduce the housing numbers and extend the term of delivery in the emerging new local plan.

2.12 The agenda for this meeting noted (paragraph 5.66) that no alternative numbers were supplied:

There is no suggestion in the motion as to what the reduced housing numbers target will be. A full assessment of options will be needed if the motion is carried. The options will need to include the existing local plan.<sup>6</sup>

2.13 Subsequent to the local elections, the following motion was carried unanimously at a Special Council meeting held on the 15<sup>th</sup> of June 2022:<sup>7</sup>

The Local Plan examination has now been completed and the Local Plan has not been adopted. We call on the Council to withdraw the local plan immediately and start work on a new Local Plan that reflects the central government stated aim to protect and preserve the precious green belt in our local area. A priority of this new Local Plan would be to produce a target housing number that genuinely reflects local need. As this housing target will be lower than previous proposals this must be supported by robust evidence. All housing developments should prioritize brownfield development. We hope that in the interests of our borough this motion is supported on a cross party basis.

2.14 Therefore, Castle Point currently lacks an up-to-date local plan, and the timeline for introduction of a new one is not confirmed.

<sup>&</sup>lt;sup>7</sup> download.cfm (castlepoint.gov.uk)



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<sup>&</sup>lt;sup>3</sup> download.cfm (castlepoint.gov.uk) Paragraphs 9.38-9.41

<sup>&</sup>lt;sup>4</sup> download.cfm (castlepoint.gov.uk), Paragraph 4.7

<sup>&</sup>lt;sup>5</sup> Castle Point: Authority postpones plans for 5,000 new homes - BBC News

<sup>&</sup>lt;sup>6</sup> download.cfm (castlepoint.gov.uk)

- 2.15 Opinion Research Services (ORS) was commissioned by CPBC to prepare a Local Housing Needs Assessment (LHNA). This was published in December 2023, concludes that exceptional circumstances exist which justify departure from the standard method, and produces a significantly lower housing need figure (255 dwellings per annum, against 351 under the standard method).
- 2.16 This differs from the findings of a Housing Needs Assessment (HNA) produced by Turley in 2022 for the South Essex authorities. It found that there were grounds for meeting or exceeding the standard method.
- 2.17 The findings of the Turley and ORS reports are reviewed later in this document.

## Local growth policies and ambitions

- 2.18 CPBC is a member of South Essex Councils (SEC), a collaborative project also including Basildon, Brentwood, Rochford, Southend-on-Sea, Thurrock, and Essex County Council.<sup>8</sup>
- 2.19 SEC sets out an ambitious vision for the future economy of South Essex. This includes improved active and public transport:

'South Essex Councils (SEC) is asking the government for a significant amount to be invested in South Essex to tackle the infrastructure deficit and for the powers to make decisions locally that will improve the lives of residents, now and in the future.'

The body also says it is working towards:

'A strategy to secure more commercial development from employers who can provide productive and well-paid employment, locally.' and 'Supported young people who are able to achieve their best and build their futures in South Essex.'.

- 2.20 These goals appear to be highly dependent on increased housing supply. A major benefit of transport investment is the unlocking of dependent development, and business cases for any such investment (and therefore government funding) will need to demonstrate this. Growing employment and retaining young people in the sub-region will also depend on a housing supply that can facilitate this.
- 2.21 SEC's vision addresses this directly:

'South Essex support the idea that investment in infrastructure can support large scale and accelerated housing delivery. Historic delivery rates have been poor in South Essex, with under investment in both infrastructure and employment. South Essex want to support the delivery of new homes, with a strong sense of place and community, through growing existing urban settlements or delivering new ones, including Garden Towns.'

2.22 The South East Local Enterprise Partnership (SELEP), which covers Essex, Kent, and East Sussex, also has significant housing delivery ambitions.<sup>9</sup>

'The South East continues to see significant growth and accelerating housing delivery remains a key ambition for SELEP. We have an excellent track record in delivery, outperforming all LEPs outside London for both housing starts and completions, with plans to

<sup>&</sup>lt;sup>9</sup> South East Local Enterprise Partnership Economic Recovery and Renewal Strategy, March 2021, SELEP.



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<sup>&</sup>lt;sup>8</sup> The Association of South Essex Local Authorities | SEC.

# Castle Point Housing Needs and Demographic Report 2 Policy Context

lead the country in delivering 25% (87,100 homes) of the government's Garden Communities programme. Alongside wider housing developments across existing communities this will significantly boost employment and growth, with the development of our garden communities alone generating over 270,000 jobs. We can promote innovation in design across our 9 Garden Cities, Towns and Villages, which will be applied at scale to share the benefits of this investment with wider housing developments across our existing communities.

To ensure that the SELEP area remains a destination of choice we must respond to the dramatic shift in behaviours that we have seen since the pandemic and consider what this means for the future of our communities, both in terms of housing design and the acceleration of housing delivery, particularly affordable housing, but also the reshaping and transitioning of our towns and high streets.'

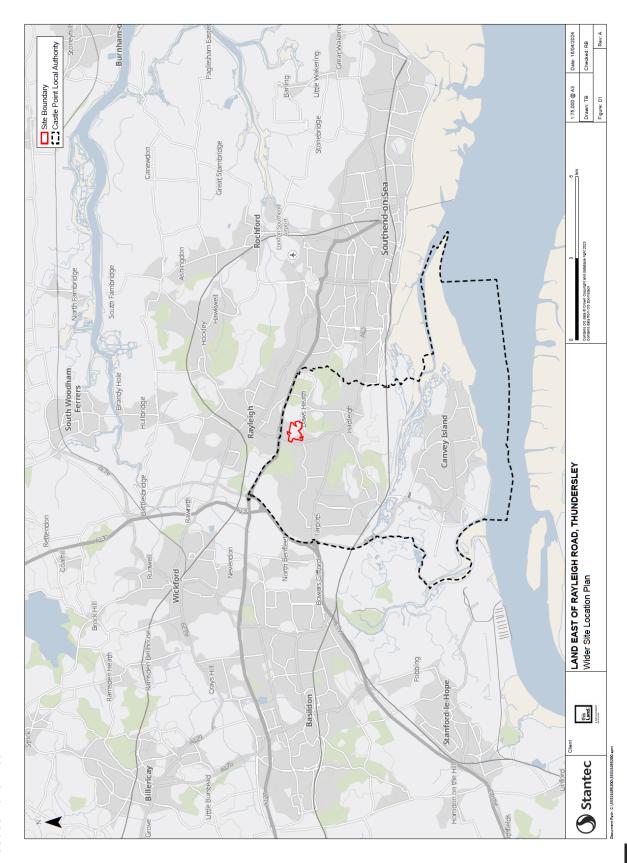
- 2.23 Whilst this does not commit the SELEP area to a specific housing delivery target, it does demonstrate the overall scale of ambition.
- 2.24 Castle Point has, therefore, formed part of an organisation which is committed to ambitious economic growth objectives and the housing needed to support them. These objectives are highly compatible with those of the LEP.



## 3 Assessment Area

- 3.1 The assessment area for this research is the Castle Point local authority area.
- 3.2 Castle Point is in South Essex. For the purposes of the HNA conducted by Turley in 2022, South Essex also includes Basildon, Brentwood, Rochford, Southend-on-Sea, and Thurrock. Where relevant, Castle Point is considered in the South Essex context.
- 3.3 The proposed development would sit in the north east of Thundersley, the county town of Castle Point. It is separated from South Benfleet to the south and west by a narrow wooded area and from Rayleigh (in Rochford local authority) by the A127 (Southend Arterial Road).
- 3.4 The site within the Castle Point local authority is shown overleaf. This illustrates the extent to which the district and the site are surrounded by urban areas, on a corridor to the east of London.
- 3.5 Neighbouring Castle Point to the west are Basildon and Thurrock, to the north is Rochford, and Southend-on-Sea is to the east of it. Southend Airport and DP World London Gateway Port are nearby, to the northeast and southwest respectively. Road and rail connections (40-45 minutes into Fenchurch Street from Benfleet station) into the capital are also available.







## 4 Standard Method Housing Need

- 4.1 The standard method for assessing housing needs provides a formula which identifies minimum annual housing need by local authority. 10
- 4.2 Government guidance states that the use of the standard method is not mandatory, but:

...if it is felt that circumstances warrant an alternative approach but authorities can expect this to be scrutinised more closely at examination. There is an expectation that the standard method will be used and that any other method will be used only in exceptional circumstances.

4.3 The standard method consists of four steps:

#### • Step 1, Setting the baseline

Projected average annual household growth over a 10-year period (with the current year as the starting point) provides a baseline.

Step 2, An adjustment to take account of affordability
 Median workplace-based affordability ratio is then used to adjust the baseline.<sup>11</sup>

#### Step 3, Capping the level of any increase

A cap limits maximum figures. Where relevant policies for housing (e.g. a Local Plan) were adopted within the last 5 years, housing need is capped at 40% above the average annual housing requirement set out in said policies. Where policies were adopted more than 5 years ago, the cap is at 40% above the higher of projected household growth (the baseline) or housing requirement set out in said policy.

#### Step 4, Cities and urban centres uplift

A 35% uplift is then applied for local authorities in the top 20 cities and urban centres.

4.4 2014-based household projections are used in Step 1. Though more recent projections are available, they are generally lower. The government's reasoning for using the 2014-based figures is as follows:

The 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes.

4.5 The affordability adjustment is applied to the baseline because household formation is itself constrained by the supply of available properties, and people may want to move to an area (e.g. for work) but be unable to find accommodation they can afford. It therefore makes the

Adjustment factor = 
$$\frac{Local\ affordability\ ratio-4}{4}*0.25+1$$



<sup>&</sup>lt;sup>10</sup> Housing and economic needs assessment. DLUHC.

<sup>&</sup>lt;sup>11</sup> Precise formula for the adjustment factor to be made is below (note that no adjustment is made if affordability ratio is below 4):

# Castle Point Housing Needs and Demographic Report 4 Standard Method Housing Need

- standard method responsive to local price signals and is consistent with the policy objective of boosting housing supply.
- 4.6 The cap is applied to ensure the standard method figure is as deliverable as possible, though government guidance stresses that it does not reduce housing need itself, and consideration can be given to delivering more than the capped housing need.
- 4.7 Government guidance is clear that the standard method provides a minimum figure, and there will be circumstances in which actual need may be higher (e.g. local growth strategies, strategic infrastructure improvements, taking on of unmet need from neighbouring authorities).
- 4.8 Under the standard method, past under-delivery does not need to be specifically addressed it will be accounted for by the affordability adjustment. The guidance does clarify, however, that:
  - Where an alternative approach to the standard method is used, past under delivery should be taken into account.
- 4.9 Moreover, where an alternative approach results in a lower housing need figure than the standard method:
  - ...the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method.
- 4.10 The 2023 Local Housing Needs Assessment (LHNA) produced by Opinion Research Services (ORS) argues that exceptional circumstances exist in Castle Point, justifying a housing need figure below standard method. This claim and the methodology of their alternative need figure are reviewed later in this report in light of the government guidance.

## **Updated Standard Method Housing Need**

- 4.11 The South Essex HNA includes calculated outcomes of the Standard Method for each of the South Essex authorities. Their numbers are reproduced in Table 4-1.
- 4.12 Updated estimates, including differences with respect to the 2022 figures from the South Essex HNA, are shown in Table 4-2.
- 4.13 For 5 of the 6 authorities, including Castle Point, very little has changed. In Brentwood, affordability ratio has fallen significantly, from 16.08 to 12.36. Therefore, it sees a substantial fall in housing need under the Standard Method.
- 4.14 Only Brentwood has a local plan adopted in the last 5 years, so for all other authorities the 40% cap is to be applied to the demographic baseline (household growth). In Thurrock, a lower affordability ratio means that market signals uplift is under 40%, so the cap does not need to be applied.



Table 4-1: Outcome of the Standard Method for South Essex authorities, 2022

		Basildon	Brentwood	Castle Point	Rochford	Southend-on-Sea	Thurrock	South Essex
1	Avg. h'hold growth 2022-2032	745.2	330.4	251.5	257.4	840.5	849.1	3274
	Median affordability ratio 2021	10.36	16.08	12.37	12.22	11.13	10.26	
2	Uplift to apply	39.8%	75.5%	52.3%	51.4%	44.6%	39.1%	
	Uncapped local housing need	1041	580	383	390	1215	1181	4790
	Adopted Local Plan number	N/A	456	N/A	250	325	925	
3	Adopted in last 5 years?	N/A	Yes	N/A	No	No	Yes	
3	Cap applied?	No	No	Yes	Yes	Yes	No	
	Capped local housing need	1041	580	352	360	1177	1181	4691
4 Uplift applied?		No	No	No	No	No	No	
	Local housing need	1041	580	352	360	1177	1181	4691

Source: South Essex HNA, Turley

Table 4-2: Outcome of the Standard Method for South Essex authorities, 2024

		Basildon	Brentwood	Castle Point	Rochford	Southend-on-Sea	Thurrock	South Essex
1	Avg. h'hold growth 2024-2034	742.0	335.9	249.6	254.1	837.7	848.6	3268
	Median affordability ratio 2023	10.51	12.36	11.2	11.66	10.51	9.84	
2	Uplift to apply	40.7%	52.3%	45.0%	47.9%	40.7%	36.5%	
	Uncapped local housing need	1044	511	362	376	1179	1158	4630
	Adopted Local Plan number	N/A	456	N/A	250	325	925	
3	Adopted in last 5 years?	N/A	Yes	N/A	No	No	No	
3	Cap applied?	Yes	No	Yes	Yes	Yes	No	
	Capped local housing need	1039	511	349	356	1173	1158	4586
4	4 Uplift applied?		No	No	No	No	No	
Local housing need		1039	511	349	356	1173	1158	4586
	Difference w.r.t. 2022	-2	-69	-3	-4	-4	-23	-105

Source: Stantec analysis



#### **Castle Point's Housing Supply Trajectory**

4.15 The Council's Annual Monitoring Report<sup>12</sup> compared supply identified in their housing trajectory to required 5-year supply (including backlog and 20% buffer). For the upcoming 2022-2027 and 2027-2032 periods, identified supply falls well short of requirements. Their Figure 9 is reproduced below as Table 4-3.

Table 4-3: Net additional dwellings in future years

Time Period	Target	20% Buffer	Backlog	Required Supply (Five Years)	Supply identified in Trajectory	Number of Years of Supply
2022-2027	1,775	355	474 <sup>3</sup>	2,604	969	1.86 years
2027– 2032	1,775	355	1,635	3,765	1,083	1.44 years

Source: Castle Point Authority Monitoring Report, 1st April 2021 – 31st March 2022, Figure 9

4.16 This demonstrates a pressing need to identify further sites for housing delivery.

<sup>&</sup>lt;sup>12</sup> Castle Point Authority Monitoring Report, 1<sup>st</sup> April 2021 – 31<sup>st</sup> March 2022, Castle Point Borough Council. <a href="download.cfm">download.cfm</a> (castlepoint.gov.uk)



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### 5 Local Evidence Base

- 5.1 In this section, the housing needs assessments produced by Turley in 2022 and ORS in 2023 are reviewed.
- 5.2 Particular attention is paid to the 'exceptional circumstances' argument made in ORS 2023.

## South Essex Housing Needs Assessment (2022)

- 5.3 This report, commissioned by the South Essex authorities in 2021 and prepared by Turley in 2022, updated and replaced its previous Strategic Housing Market Assessment (SHMA). Turley therefore has previous experience of housing and demographic analysis in the subregion. The headline findings of the 2022 Housing Needs Assessment (HNA) are summarised below.
- 5.4 Recent housing development across South Essex was short of historic peaks and of the rates seen in the region and nation, with net completions falling year-on-year since 2017/18.
- 5.5 The population of South Essex has continued to grow, but at a decreasing rate. For example, in 2019/20 it grew by 0.2%, the lowest rate since the mid-1990s. The region and nation saw much less pronounced slowdowns in population growth.
- House price increases have exceeded regional and national averages. Between 2014 and 2021 mean house prices in the East and England increased by 46% and 34% respectively; in South Essex increases ranged from 49% (in Castle Point) to 60% (in Thurrock).
- 5.7 The standard method indicated a requirement across South Essex of at least 4,691 dwellings per annum this closely aligns with the previous SHMA and is markedly higher than past delivery.
- 5.8 The study concludes that exceptional circumstances to justify housing needs below standard method have not been identified in any of the six authorities, and that standard method provides broadly reasonable estimates of need in each of them.

#### Findings of the South Essex Housing Needs Assessment for Castle Point

- 5.9 Castle Point has seen the slowest growth of the South Essex authorities in its housing stock (net completions since 2016 as a proportion of existing dwelling stock) just 1.9%. This compares to 3.0% in South Essex, 5.1% in the East of England, and 4.8% in England.
- 5.10 Its existing housing stock is dominated by detached houses and bungalows relative to South Essex, the region, and nation, with very few terraced houses and flats.
- 5.11 In common with the other South Essex authorities, it has a vacancy rate below the national average (2.0% compared to 3.0%).
- 5.12 Population growth since 2010 has been slow relative to the other South Essex authorities. Deaths have exceeded births in recent years, in contrast to South Essex as a whole.
- 5.13 Mean price paid for properties is below the South Essex average (£356,692 compared to £386,276) and 2014-21 change in house prices was +49%, lower than any of the other South



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- Essex authorities. This is still, however, above regional and national figures. Over the same period, transactions volume has declined roughly in line with South Essex overall.
- 5.14 Average and lower quartile monthly rents by number of bedrooms are typical for levels seen elsewhere in South Essex (though Brentwood is something of an outlier, with rents markedly higher than the other five authorities).
- 5.15 Affordability ratio in Castle Point increased from 11.17 in 2020 to 12.37 in 2021, necessitating an adjustment to the uplift applied under the standard method. Affordability ratios increased for all South Essex authorities, but the only one requiring a larger change in affordability adjustment was Brentwood.
- 5.16 The baseline (annual housing growth) of 251.5 was therefore adjusted up to 383, but capped at 352 (40% above the higher of the baseline or latest adopted requirement). This forms part of the 4,691 dwellings per annum requirement for South Essex overall estimated in the HNA. Note that more recent estimates of standard method need would provide slightly different results depending on initial forecast year and updated affordability ratios.

## Castle Point Local Housing Needs Assessment (2023)

- 5.17 This LHNA, produced by ORS following the withdrawal of Castle Point's local plan, produces a substantially lower housing need figure than the standard method.
- 5.18 The housing need figure in the LHNA is based on the following methodology:
  - 2018-based household projections with the 10-year migration trend and 2018-based HRR for 2023-2043 are used as the demographic baseline (the standard method uses 2014-based principal projections).
  - This baseline is adjusted to account for 2021 Census and mid-year population estimates.
  - An affordability uplift is then added. Rather than the percentage uplift determined by affordability ratio <sup>13</sup> used in the standard method, this includes:
    - Allowance for vacant and second homes;
    - Non-household population (C2 Dwelling equivalent);
    - Concealed families<sup>14</sup>;
    - Suppressed household formation, assuming formation rates for under-45s will progressively return to 2001 levels.
- 5.19 This approach is compared with the outcome of standard method 2024 in Figure 5-1.

<sup>&</sup>lt;sup>14</sup> These refer to those who would be expected to lead their own households but are instead living with other households – e.g. couples or lone parents living with others. We note that the LHNA produced by ORS does not include all of these households in this figure, just the growth therein over the last 20 years.



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<sup>&</sup>lt;sup>13</sup> Median house prices to average workplace-based earnings.

- The LHNA's demographic baseline (196 after updating for Census data) is 54 dwellings or 22% lower than the 2014-based projection used in standard method.
- The affordability uplift in standard method is capped at 40% (100 dwellings). The total uplift above the baseline in the LHNA is 59 dwellings, which is only 30% of the baseline. A 40% uplift applied to this baseline would yield a requirement of 274 dwellings per annum instead though this would still be well below the standard method outcome.
- As mentioned previously, past under delivery should be taken into account where an
  alternative approach to the standard method is used. Whilst elements of the method
  in the LHNA (concealed families, suppressed household formation) do relate to past
  under delivery, the smaller scale (in absolute and relative terms) of the uplift in the
  LHNA methodology compared to standard method suggest that it may not sufficiently
  address the issue.
- Using a start year of 2023 (i.e. the same as the LHNA) would give marginally different results for standard method: demographic baseline of 251, affordability uplift of 129, reduced by 29 due to the cap, for a total of 351.

400 112 349 350 -12 300 34 255 250 250 13 5 197 200 -1 150 100 50 0 2014-based (principal) 2018-based (10y mig.) Vacancy rate Affordability uplift Standard method total C2 Dwelling equivalent 40% cap applied 2021 adjustment Concealed families Suppressed formation LHNA total

Figure 5-1: Comparison of standard method and LHNA approaches to estimating housing need

Source: LHNA 2023 Figure 24, Stantec analysis

5.20 The LHNA also reviews affordable housing need, identifying a net need of 56 units per year. This differs dramatically from a finding of 324 per year in Turley's HNA 2022. A later chapter



of this report looks at affordable housing need in detail, including reviews of the two approaches taken in the HNA 2022 and LHNA 2023.

#### Does Castle Point have exceptional circumstances?

- 5.21 The LHNA argues that exceptional circumstances exist in Castle Point, justifying an alternative approach to estimating housing need.
- 5.22 National policy and guidance strongly support the use of the standard method in assessing housing need. Paragraph 61 of the National Planning Policy Framework (NPPF) states (our emphasis in bold) that <sup>15</sup>:

To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area (see paragraph 67 below). There may be exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach to assessing housing need 16; in which case the alternative approach should also reflect current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

#### 2018-based vs 2014-based household projections

- 5.23 Planning practice guidance (PPG) sets out how to calculate housing need according to the standard method. In Step 1 Setting the baseline, it confirms that one should use 2014-based projections, specifically ten consecutive years of projections from the current year<sup>17</sup>. No variant projection is mentioned, so it is implied that these are the principal projections.
- 5.24 Whilst the 2018-based projections are now available, the use of 2014-based projections is a policy choice aimed at providing greater stability for planners and boosting housing supply to help meet the 300,000 homes a year target. The consultation response on the Levelling Up and Regeneration Bill makes it clear that the government remains committed to the standard method: "...we are not proposing any changes to the standard method formula itself through this consultation. However, we will review the implications on the standard method of new household projections data based on the 2021 Census, which is due to be published in 2024." A statement following the December 2023 update to the NPPF reinforces the 300,000 homes a year target.

<sup>&</sup>lt;sup>19</sup> Written statements - Written questions, answers and statements - UK Parliament "Our reforms will also strengthen our ability to meet our target of 300,000 additional homes a year."



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<sup>&</sup>lt;sup>15</sup> National Planning Policy Framework - 5. Delivering a sufficient supply of homes - Guidance - GOV.UK (www.gov.uk)

<sup>&</sup>lt;sup>16</sup> A footnote to paragraph 61 of the NPPF sheds some light on what might qualify as exceptional circumstances justifying an alternative approach to assessing need: *Such particular demographic characteristics could, for example, include areas that are islands with no land bridge that have a significant proportion of elderly residents.* Whilst there is no comprehensive list of what qualifies as 'exceptional', the example given (which would be applicable for very few areas) strongly suggests that such circumstances need to be very rare indeed.

<sup>&</sup>lt;sup>17</sup> Housing and economic needs assessment - GOV.UK (www.gov.uk)

<sup>&</sup>lt;sup>18</sup> Levelling-up and Regeneration Bill: reforms to national planning policy - GOV.UK (www.gov.uk)

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- 5.25 Moreover, the difference between the 2018-based and 2014-based household projections observed for Castle Point is not exceptional when compared to other local authorities in England. This is true whether considering the principal 2018-based projections or the 10-year migration trend variant.
- 5.26 This is shown in Table 5-1 and Table 5-2, which look at differences between projected household growth for the 2023-2033 period under each of the two sets of 2018-based projections considered versus the 2014-based baseline projections. The top 5 (i.e. those which exceed 2014-based projections the most) and bottom 5 are included in the tables, along with Castle Point, the overall figure for England, and the median difference.
- 5.27 Looking at the 2018-based principal projections in Table 5-1, Castle Point is ranked 213<sup>th</sup> out of 326 English local authorities. 2018-based projections are 2.7 percentage points lower than 2014-based (i.e. 3.7% rather than 6.4%). This is a larger fall than the English total or the median, but much more drastic differences are observed elsewhere.
- 5.28 Considering the 2018-based 10-year migration variant in Table 5-2 shows a similar picture. Castle Point is ranked 155<sup>th</sup> i.e. very close to the middle, and the -1.6% difference is only just above the -1.7% median.
- 5.29 Therefore, policy guidance is very clear that 2014-based principal projections should be used. There is nothing in the guidance to suggest that an unusual difference between them and the 2018-based projections is grounds for use of an alternative method. Even if this were the case, however, it does not apply in Castle Point.

Table 5-1: Differences between 2018-based and 2014-based principal household projections 2023-2033

Local authority	2014-based principal projection	2018-based vs 2014- based principal projection	Rank
North West Leicestershire	6.9%	8.4%	1
Wychavon	6.6%	6.5%	2
Daventry	7.1%	6.0%	3
Blaby	6.4%	5.9%	4
Cotswold	7.7%	5.6%	5
Castle Point	6.4%	-2.7%	213
	•••		
Watford	12.6%	-9.9%	322
Enfield	15.5%	-10.5%	323
Barking and Dagenham	17.5%	-10.7%	324
Luton UA	12.5%	-11.9%	325
Isles of Scilly UA	-2.4%	-16.2%	326
England	8.5%	-2.0%	N/A
Median local au	ıthority	-1.1%	N/A

Source: ONS household projections, Stantec analysis



Table 5-2: Differences between 2018-based 10-year migration variant and 2014-based principal household projections 2023-2033

Local authority	2014-based principal projection	2018-based 10 year migration vs 2014-based principal projection	Rank
North West Leicestershire	6.9%	1.5%	1
Telford and Wrekin UA	5.7%	0.9%	2
Wychavon	6.6%	0.9%	3
Cheshire West and Chester UA	3.1%	0.8%	4
Daventry	7.1%	0.7%	5
	•••		
Castle Point	6.4%	-1.6%	155
Luton UA	12.5%	-4.8%	322
Enfield	15.5%	-5.2%	323
Oxford	9.1%	-6.0%	324
City of London	12.2%	-6.5%	325
Isles of Scilly UA	-2.4%	-7.3%	326
England	8.5%	-2.0%	N/A
Median local au	uthority	-1.7%	N/A

Source: ONS household projections, Stantec analysis

5.30 PPG also states that an affordability adjustment is required, as 'household growth on its own is insufficient as an indicator of future housing need' and that uplifts of the magnitude contained in the standard method are required to address historic under-supply: 'The specific adjustment in this guidance is set at a level to ensure that minimum annual housing need starts to address the affordability of homes.' A rationale for the lower affordability uplift used in the LHNA is not provided.

2021-based population projections

- 5.31 The latest household projections are the 2018-based ones and have been given prominence in the LHNA for this reason.
- 5.32 There are, however, more recent (albeit interim) projections for population. These are 2021-based and were published in January 2024.
- 5.33 These projections strongly indicate that population growth will be higher than anticipated by 2018-based projections. Figure 5-2 compares English population 2021-2050 (with the 2023-2043 plan period highlighted) under the 2014-, 2018-, and 2021-based projections.

<sup>&</sup>lt;sup>20</sup> Housing and economic needs assessment - GOV.UK (www.gov.uk) 006 Reference ID: 2a-006-20190220



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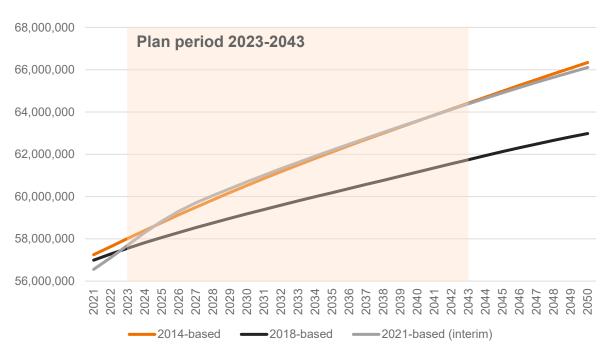


Figure 5-2: Comparison of 2014-based, 2018-based, and interim 2021-based principal population projections for England, 2021-2050

Source: ONS principal population projections and mid-year population estimates<sup>21</sup>

- 5.34 The 2021-based projections strongly suggest a dramatically different picture from the 2018-based projections, and one strikingly similar to 2014-based projections, especially towards the end of Castle Point's plan period.
- 5.35 There are some caveats to bear in mind regarding the 2021-based projections:
  - They are interim and need to be treated as such.
  - They only provide national figures, not sub-national breakdowns, so do not give a
    picture specific to Castle Point.
  - They are population projections population may not 'translate' into households in the same way as shown in 2014-based household projections. Nevertheless, other things being equal higher population with result in more households. In 2043, the difference between 2021-based and 2018-based projections is just over 2.6 million. This could amount to in excess of 1 million additional households across England.<sup>22</sup>
  - Recent drops in the UK's birthrate may not have been fully captured in them. 23

<sup>&</sup>lt;sup>23</sup> Falling birthrate to leave UK reliant on immigration until 2100 (thetimes.co.uk) (paywall)



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<sup>&</sup>lt;sup>21</sup> Mid-year population estimates used for 2021, 2022 in the 2021-based (interim) projections <sup>22</sup> At Census 2021, England's household population was 98.3% of total population. On this basis the additional 2,638,460 residents in the 2021-based projections amount to 2,592,419 additional household residents. In 2022, average household size in the UK was 2.36. Using this household size, those residents would form 1,098,483 households (though an ageing population may lead to household sizes falling and a larger impact). Families and households in the UK - Office for National Statistics (ons.gov.uk)

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5.36 Overall, the evidence provided by the 2021-based population projections strongly suggests that the 2018-based household projections underestimate future household growth, and the 2014-based version provides a more reliable guide.

#### Revisions to population figures

- 5.37 The LHNA's principal argument for exceptional circumstances relates to unattributable population change (UPC) figures, and revisions made to them following Censuses.
- 5.38 It argues that ONS data has consistently over-estimated population growth for the area, and that this justifies a housing need figure below standard method.
- 5.39 A downward UPC revision was necessary following the 2011 Census. The LHNA then contrasts mid-year population estimates to 2020 with the population found at the 2021 Census, and states that the Census shows a population roughly 1,000 persons lower than the MYE data.
- 5.40 Detailed data on UPC following the 2021 Census is now available. Analysis of the data shows that over the 2011-2021 period, UPC in Castle Point was 46 persons, 0.051% of the Census 2021 population figure. For England it was 36,606 or 0.065%.<sup>24</sup> Therefore, it was very similar to the national figure, but the focus of the argument is on the *change* in population estimates brought about by the Census.
- 5.41 In order to evaluate whether or not Castle Point's circumstances are exceptional, we compare Census 2021 population figures to 2020 mid-year population estimates (MYEs).<sup>25</sup> 2021 MYEs are available but include rebasing following the 2021 Census, so do not capture the difference between prior forecasts and Census figures.<sup>26</sup>
- 5.42 This is also similar to the analysis conducted by ORS in the LHNA. Their Figure 67 is replicated below and shows various population estimates including MYE and Census. ORS say that,

"The data for Castle Point showed a much more rapid rise in the mid-year population since 2011, however, this again was not borne out by the Census in 2021 which shows a population around 1,000 persons lower than the MYE data. While this has been tracked by the admin-based data sources, it has always been the case that the mid-year population estimate has always been below the admin-based estimate." (Appendix A, page 107)

<sup>&</sup>lt;sup>26</sup> Population estimates for the UK, England, Wales, Scotland and Northern Ireland - Office for National Statistics (ons.gov.uk) 'The mid-2021 population estimates are primarily based on the 2021 censuses (for England and Wales, and Northern Ireland). The usual resident population as at Census day (21 March 2021), by single year of age, is aged on to 30 June 2021 and then births, deaths and migration are accounted for.'



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<sup>&</sup>lt;sup>24</sup> <u>Unattributable Population change by country and Local Authority and Year - Office for National</u> Statistics (ons.gov.uk)

<sup>&</sup>lt;sup>25</sup> Population estimates for the UK, England and Wales, Scotland and Northern Ireland - Office for National Statistics (ons.gov.uk)

**Total Population** 95.000 94,000 93,000 92,000 × Number of persons 91,000 × 90,000 0 89.000 88.000 87,000 86.000 85.000 Current Mid-Year Estimate (MYE) MYE rolled forward from 2001 MYE following MSIP excluding UPC adjustment — — MYE following MSIP rolled forward from 2011 Census estimate for Census Day X ONS Admin-based Population Estimates v2

Figure 67: Estimates of Total Population, Castle Point 2001 to 2019 (Source: Mid-year population estimates, ONS; Census of population, ONS; Admin-based population estimates, ONS)

Source: LHNA 2023

#### 5.43 Table 5-3 compares the MYE and Census projections<sup>27</sup>. We note that:

- For all authorities, % differences between Census and MYE 2021 (d) is small. This is because those MYEs include post-Census rebasing and the main differences are those estimated between Census Day (21 March 2021) and the date for the MYEs (30 June 2021).<sup>28</sup>
- ii. Conversely, differences between Census and MYE 2020 (e) are slightly larger for England overall and vary substantially between authorities (the top and bottom 5 authorities for this measure are included individually to demonstrate this point). This reflects the inherently higher degree of unreliability in MYEs immediately before a Census (i.e. when the last Census is almost a decade old).
- iii. For Castle Point, Census population was 1.035% lower than MYE 2020. This is a slightly larger deviation than the 0.106% fall for England or 0.052% increase for the median authority. Of the 309 authorities, Castle Point is ranked 218<sup>th</sup> for total difference i.e. only just outside the middle third.

<sup>&</sup>lt;sup>28</sup> Rebasing of mid-year population estimates following Census 2021, England and Wales - Office for National Statistics (ons.gov.uk)



<sup>&</sup>lt;sup>27</sup> 309 rather than 326 authorities are included here, only those for which all data is available. This is not the case for all of them due to local authority reorganisations.

iv. Excluding London authorities, which may behave differently to the rest of the country, makes little difference to these conclusions. For England excluding London, Census estimates are 0.300% higher than MYE 2020. 17 London authorities are ranked above Castle Point and 16 below it, so Castle Point's rank changes from 218/309 to 201/276 – i.e. it ranks higher than nearly 30% of the remaining authorities.

Table 5-3: Comparison of mid-year population estimates 2020 and 2021 with Census 2021

Local		Population		(d) % difference,	(e) % difference,	Rank
authority	(a) MYE 2021	(b) MYE 2020	(c) Census 2021	Census vs MYE 2021	Census vs MYE 2020	Ralik
Cambridge	144,714	125,063	145,674	0.663%	16.480%	1
Reading	173,170	160,337	174,224	0.609%	8.661%	2
Ealing	366,127	340,341	367,115	0.270%	7.867%	3
Harlow	93,374	87,280	93,328	-0.049%	6.929%	4
Oxford	160,021	151,584	162,041	1.262%	6.898%	5
<b>Castle Point</b>	89,708	90,524	89,587	-0.135%	-1.035%	218
Coventry	343,320	379,387	345,324	0.584%	-8.978%	305
Islington	216,767	248,115	216,589	-0.082%	-12.706%	306
City of London	8,618	10,938	8,583	-0.406%	-21.530%	307
Westminster	205,087	269,848	204,236	-0.415%	-24.314%	308
Camden	210,390	279,516	210,136	-0.121%	-24.821%	309
England	56,536,419	56,550,138	56,490,041	-0.082%	-0.106%	N/A
excl. London			-0.104%	0.300%	N/A	
	Median a	uthority		-0.186%	0.052%	N/A

Source: ONS, Census 2021, Stantec analysis

5.44 This analysis does not, therefore, support the view that the Census-driven revision of population estimates for Castle Point was exceptional in the national context.

#### **Exceptional circumstances in the NPPF**

5.45 A footnote to paragraph 61 of the NPPF (quoted earlier in this chapter) sheds some light on what may clarify as exceptional circumstances:

Such particular demographic characteristics could, for example, include areas that are islands with no land bridge that have a significant proportion of elderly residents.

5.46 There is no comprehensive list of what constitutes exceptional circumstances; however, the example given in the guidance suggests that (a) they would tend to relate to the fundamental characteristics of the place (e.g. its demographics), not to variations in data (b) they have to be very rare indeed – the example given is clearly a highly unusual set of circumstances which does not include Castle Point.



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#### **Summary and conclusions**

- 5.47 The use of the standard method in assessing housing need is strongly supported by national policy and guidance in all but exceptional circumstances, as part of the key government policy of 300,000 net housing additions per year in England.
- 5.48 The standard method uses principal 2014-based household projections to inform the demographic baseline. The LHNA instead uses the 2018-based 10-year migration variant.
- 5.49 Analysis shows that in the national context, the difference between 2018-based and 2014-based projections for Castle Point is not unusual.
- 5.50 Rather than following planning guidance on use of a workplace-based affordability ratio, the LHNA uses a different methodology which results in a significantly lower uplift to the demographic baseline. No rationale for this change is given.
- 5.51 Revisions made to population estimates for Castle Point following Census 2021 are cited as a reason for use of an alternative methodology. Whilst these changes appear significant, our analysis confirms that Castle Point is not unusual in the national context.
- 5.52 The NPPF does not offer a concrete definition of what would constitute exceptional circumstances, but strongly suggests that they would relate to demographics rather than data and would need to be very rare indeed.
- 5.53 The principal arguments advanced for the use of an alternative method in Castle Point relate to the 2014-based household projections and to the revisions to population estimates driven by Census 2021. Our analysis demonstrates that Castle Point is not exceptional on these measures in the context of all English local authorities: it is ranked 218<sup>th</sup> out of 309 on the difference between Census 2021 and MYE 2020 estimates.
- 5.54 Therefore, the circumstances used in the LHNA to justify setting housing need below standard method for Castle Point are not exceptional. Nearly one third of English local authorities are 'more exceptional' on the comparison of Census and MYE estimates. Were all these authorities to set housing targets below standard method on this basis, the goal of delivering 300,000 homes a year (which is already challenging) would be jeopardised entirely.
- 5.55 With this in mind, we agree with the conclusions of the South Essex HNA prepared by Turley in 2022, that exceptional circumstances do not exist, and that standard method provides a reasonable estimate of housing need.



## 6 Demographic and Housing Context

This chapter reviews demographic and housing evidence on Castle Point, incorporating the latest available data (including Census 2021, which was not available at the time of the HNA). This includes comparison with South Essex (the six authorities as defined in the HNA), the East of England, and England.

## **Demographic Evidence**

6.2 Castle Point has experienced very slow population growth over the last 30 years – population even declined in the early-mid 1990s, only recovering its 1991 level in 2003. As shown in Figure 6-1, the growth of South Essex overall has been roughly in line with the national average, but some way below that of the region. This mirrors the findings of the South Essex HNA, but with the newest data showing small declines in the population of Castle Point and South Essex.

130.0

125.0

120.0

115.0

110.0

100.0

95.0

90.0

Castle Point South Essex East England

Figure 6-1: Population index (1991=100)

Source: ONS Nomis, Population estimates - local authority based by single year of age, Stantec analysis

Annual population changes over the past decade show a similar picture, with low population growth across the board. This is shown in Figure 6-2.



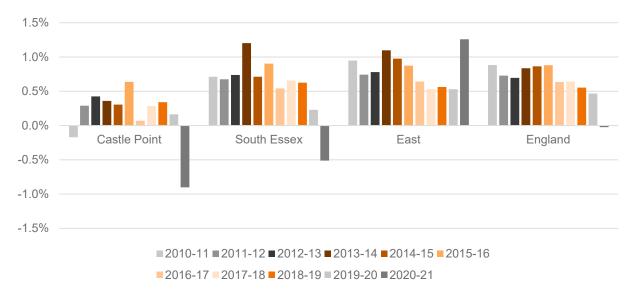


Figure 6-2: Annual population changes, 2010-2021

Source: ONS Nomis, Population estimates - local authority based by single year of age, Stantec analysis

- As identified in the HNA, deaths in Castle Point have exceeded births in most recent years, with the small net population growth mainly a result of internal migration.
- This is forecast to continue for the coming decade, as shown in Figure 6-3. 2014-based and 2018-based projections are shown; they show a similar picture, with generally lower growth in the 2018-based figures (reflecting the national picture). Note that 2014-based figures are to the nearest 100, and in all years shown international migration in and out of Castle Point has been rounded to 100, so net international migration always comes out as 0. The 'true' values are likely to be similar to (slightly higher than) those in the 2018-based projections.

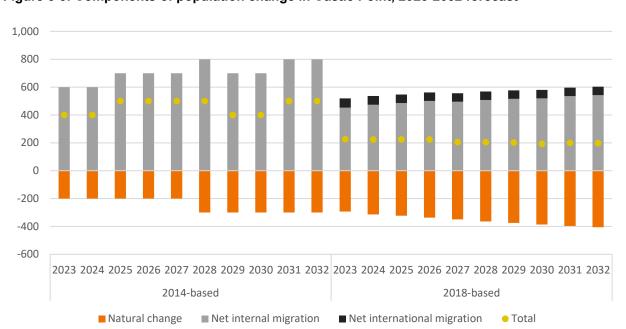


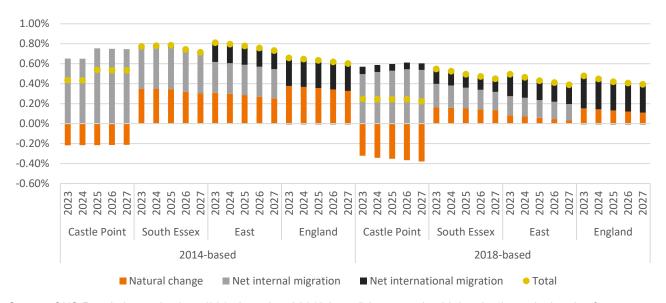
Figure 6-3: Components of population change in Castle Point, 2023-2032 forecast

Source: ONS Population projections (2014-based and 2018-based) incorporating births, deaths and migration for regions and local authorities: Table 5, Stantec analysis



6.6 This is in contrast to comparator regions. Five-year forecasts show net positive natural change (as a proportion of population) for South Essex, East, and England, plus higher rates of net international migration. Again, 2014-based and 2018-based projections are shown for comparison.

Figure 6-4: Components of population change in Castle Point and comparators, 2023-2027 forecast



Source: ONS Population projections (2014-based and 2018-based) incorporating births, deaths and migration for regions and local authorities: Table 5, Stantec analysis

6.7 Analysis of ONS data on internal migration<sup>29</sup> shows that the biggest flows into and out of Castle Point related to those aged 25-44, who made up roughly a third of flows in each direction, as shown in Table 6-1.

Table 6-1: Internal migration to and from Castle Point by age group, 2022

	All ages	0-9	10-17	18-24	25-44	45-64	65+
In-migration	4296	470	318	610	1484	830	584
% of total	100.0%	10.9%	7.4%	14.2%	34.5%	19.3%	13.6%
Out-migration	4157	411	238	770	1359	867	512
% of total	100.0%	9.9%	5.7%	18.5%	32.7%	20.9%	12.3%

Source: ONS, Stantec analysis

- 6.8 Breaking down in-migration and out-migration data shows that most moves were relatively local. The top ten origin and destination locations are shown in Table 6-3 and Table 6-4, and these locations account for 71% of moves in and 56% of moves out respectively.
- Southend-on-Sea and Basildon top both tables. Other locations in Essex (mainly South 6.9 Essex) and east London – plus East Suffolk for moves out – make up the rest of the top ten authorities in each table.

<sup>&</sup>lt;sup>29</sup> Internal migration in England and Wales - Office for National Statistics (ons.gov.uk)



Table 6-2: Internal migration to Castle Point by origin location, 2022

	All	% of		By age group				
	ages	total	0-9	10-17	18-24	25-44	45-64	65+
Southend-on-Sea	775	18.6%	96	70	56	306	168	80
Basildon	728	17.5%	106	67	55	244	151	104
Thurrock	387	9.3%	52	26	30	146	78	55
Rochford	334	8.0%	38	23	27	120	62	64
Havering	236	5.7%	16	17	22	78	72	32
Barking and Dagenham	166	4.0%	14	16	12	47	46	30
Newham	117	2.8%	11	9	9	31	30	28
Chelmsford	94	2.3%	13	4	15	30	20	12
Hackney	69	1.7%	31	5	4	24	4	0
Colchester	59	1.4%	10	6	16	21	2	2

Source: ONS, Stantec analysis

Table 6-3: Internal migration from Castle Point by destination location, 2022

	All	% of	By age group					
	ages	total	0-9	10-17	18-24	25-44	45-64	65+
Southend-on-Sea	745	17.9%	83	53	69	308	142	90
Basildon	433	10.4%	58	36	44	166	81	49
Rochford	381	9.2%	53	17	39	143	78	51
Chelmsford	159	3.8%	11	14	25	61	35	13
Maldon	138	3.3%	11	10	6	36	54	20
Thurrock	127	3.1%	17	9	17	36	28	19
Tendring	112	2.7%	8	6	4	24	41	29
Braintree	104	2.5%	12	5	6	36	35	9
Colchester	91	2.2%	8	2	23	38	14	6
East Suffolk	50	1.2%	2	4	2	11	18	13

Source: ONS, Stantec analysis

## **Housing Evidence**

#### Housing stock and changes therein

- 6.10 The South Essex HNA produced by Turley noted that housing stock had grown more slowly in South Essex than the national average, especially in Castle Point. Updated analysis looking at a longer period (10 years rather than 5) confirms this. Figure 6-5 takes number of dwellings in 2012 as a starting point and shows net additions as a percentage of these for the following decade. Raw numbers for start and end years are also shown for context.
- 6.11 Rates of net additions in South Essex as a whole and Castle Point particularly are consistently below England. Whilst the national rate generally trends upwards over the period, those for the sub-region and district do so much more slowly if at all. By 2019-20, housing



- additions in England are over 1.0% of the 2012 stock (i.e. 1 per 100 existing houses), but in Castle Point just 0.2% (1 per 500).
- 6.12 Over the decade: England added 1,990,551 dwellings (8.6% of 2012 stock); South Essex added 18,936 (5.9%); Castle Point added 1,540 (4.1%). Castle Point's net addition of 205 dwellings in 2021/22 was just 58% of standard method need (355), as acknowledged in the Council's latest Annual Monitoring Report. 30

1.20% 232816 1.00% 0.80% 2314 0.60% 124722 205 1572 0.40% 115 0.20% 0.00%

2012-13 2013-14 2014-15 2015-16 2016-17 2017-18 2018-19 2019-20 2020-21 2021-22

-South Essex -

Figure 6-5: Net housing additions as % of 2012 stock, with numbers for start/end years

Source: ONS Live tables on dwelling stock (including vacants): Table 100, Table 123, Stantec analysis

Castle Point —

6.13 Table 6-4 breaks down net additions over the decade by component. Note that the first four columns sum to more than 100%, with demolitions bringing the total to 100%. New builds dominate net additions across the board but are a smaller component for Castle Point than for South Essex or England. Castle Point is also notable for a high rate of demolitions - which may be a positive, reflecting replacement of obsolete housing stock – and 'other gains and losses', which includes caravans and houseboats.

Table 6-4: Components of net additions, 2012-2022 (% of total)

	New build	Net conversions	Net change of use	Net other gains and losses	Demolitions
Castle Point	79.6%	1.2%	4.1%	26.9%	-11.8%
South Essex	85.8%	1.6%	15.7%	2.3%	-5.4%
England	89.5%	2.3%	12.2%	0.4%	-4.5%

Source: DLUHC Housing supply: net additional dwellings, Stantec analysis

<sup>&</sup>lt;sup>30</sup> Castle Point Authority Monitoring Report, 1<sup>st</sup> April 2021 – 31<sup>st</sup> March 2022, Castle Point Borough Council. download.cfm (castlepoint.gov.uk)



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# Castle Point Housing Needs and Demographic Report 6 Demographic and Housing Context

- 6.14 Census 2021 data shows that the share of detached properties in Castle Point is relatively high, with very few terraced properties or flats.
- One limitation of the Census data relative to the VOA data used in the South Essex HNA is that it does not categorise bungalows separately. It does, however, break down the 'other or unknown' category (in the VOA figures, 5% of housing stock in Castle Point, 2% in the East, 1% in each of South Essex and England), and this data, in Table 6-5, shows that 3.2% (i.e. over 1,000) of Castle Point households are in caravans or other mobile or temporary structures. Whilst this may be a choice for some households, especially given the coastal location, it is likely that for many living in these housing types is a result of socio-economic and housing supply circumstances.
- 6.16 The LHNA produced by ORS notes (paragraph 5.22) that the Thorney Bay caravan site hosts 191 permanent households (registered for Council Tax) of which an estimated 51 are on low incomes. The planned closure and redevelopment of the park home site will displace these households.

Table 6-5: Housing types, 2021

Housing type	Castle Point	South Essex	East	England
Detached	41.7%	22.9%	29.6%	23.2%
Semi-detached	38.1%	33.2%	31.0%	31.5%
Terraced	7.6%	20.9%	21.2%	23.2%
In a purpose-built block of flats or tenement	7.7%	17.1%	14.5%	16.7%
Part of a converted or shared house, including bedsits	0.8%	3.8%	1.7%	3.4%
Part of another converted building, for example, former school, church or warehouse	0.1%	0.5%	0.7%	0.8%
In a commercial building, for example, in an office building, hotel or over a shop	0.8%	0.9%	0.7%	0.8%
A caravan or other mobile or temporary structure	3.2%	0.8%	0.6%	0.4%

Source: Census 2021, Stantec analysis

6.17 The Council's Annual Monitoring Report confirms that only 158 of the 205 net housing additions in 2021/22 were 'Traditionally Built Homes', with the remainder accounted for by mobile homes and boats (and a net loss of 26 caravans). This suggests that the proportion living in mobile or temporary structures is growing. Figure 5 from the Annual Monitoring Report is reproduced below.<sup>31</sup>

<sup>&</sup>lt;sup>31</sup> Castle Point Authority Monitoring Report, 1<sup>st</sup> April 2021 – 31<sup>st</sup> March 2022, Castle Point Borough Council. download.cfm (castlepoint.gov.uk)



Туре	Completions	Losses	NET
Traditionally Built Homes	185	27	158
Mobile Homes	68		68
Caravans	9	35	-26
Boats	7	2	5
TOTALS	269	64	205

Source: Castle Point Authority Monitoring Report, 1st April 2021 - 31st March 2022, Figure 5

6.18 The HNA found that in terms of housing stock by number of bedrooms, Castle Point was quite similar to the East of England overall – despite its radically different mix of property types. Figure 6-6 reinforces this with Census 2021 data, and further breaks this down by main housing type. At this more granular level, it is evident that Castle Point has relatively high shares of 1-2 bedroom detached houses and 3+ bedroom terraced houses.

Figure 6-6: Number of bedrooms overall and by main housing types



Source: Census 2021, Stantec analysis

#### Prices and affordability

- 6.19 Both the South Essex HNA produced by Turley and the Castle Point LHNA produced by ORS review evidence on house prices.
- 6.20 ONS data on median house prices for the South Essex authorities, East of England, and England is shown in Figure 6-7. This shows that in 2023, prices in Castle Point were slightly above the regional average though within South Essex, prices in Rochford and especially Brentwood were higher still.



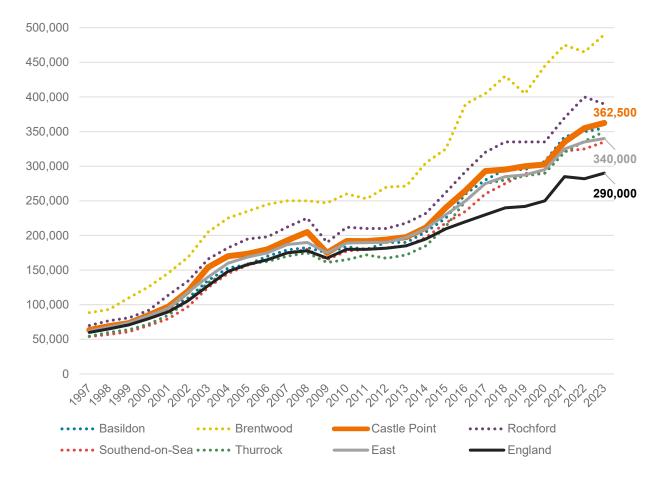


Figure 6-7: Median house prices, 1997-2023

Source: ONS Housing affordability in England and Wales

6.21 Housing affordability ratios are shown in Figure 6-8. Like house prices, these grow over time, showing that house price growth has outstripped earnings growth. In 2023, Castle Point was above the regional average, but the difference here is larger than for prices – 14.8% higher (11.2 vs. 9.76 in the East) rather than 6.6% higher (£362,500 vs. £340,000). This reflects lower earnings in Castle Point, which combines with higher house prices to make for significantly worse affordability.

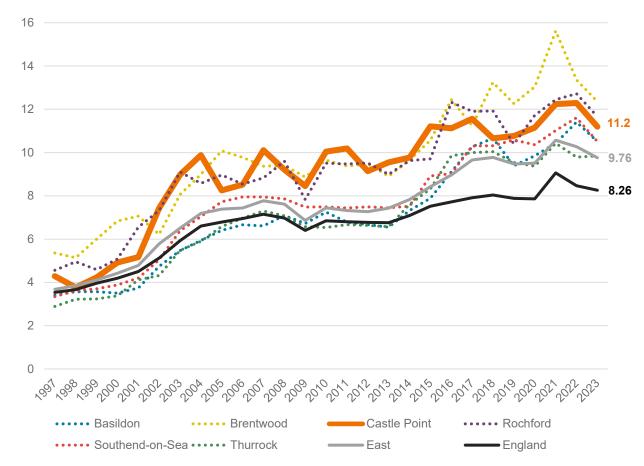


Figure 6-8: Ratio of median house prices to workplace-based earnings, 1997-2023

Source: ONS Housing affordability in England and Wales

This reflects the findings in the HNA that affordability in South Essex has been worse than that in the region and nation. The most recent data shows slight improvements in affordability ratios. This is a response to higher interest rates, which may themselves make housing more unaffordable. This is discussed further in an appendix to this document.

#### Tenure and household formation

6.23 Figure 6-9 shows data from the 2021 Census on housing tenure by age of household reference person (HRP), along with differences with respect to the 2011 Census. There have been marked declines in the rate of home ownership among those in the 35-44 and 45-55 age groups, with most of the difference made up by private rental.<sup>32</sup>

Figure 6-9: Housing tenure by age of HRP, 2021 Census vs 2011 Census

			2021 0	Census		D	ifference	vs 2011	
		Castle Point	South Essex	East	England	Castle Point	South Essex	East	England
	Owned	80.4%	67.7%	66.0%	61.6%	-2.5%	-2.8%	-2.3%	-2.5%
Total	Social rented	5.5%	14.2%	15.6%	17.4%	0.1%	-0.3%	-0.1%	-0.3%
	Private rented	14.1%	18.0%	18.4%	20.9%	2.3%	3.1%	2.4%	2.8%
	Owned	33.5%	17.5%	16.2%	13.4%	7.0%	1.2%	1.9%	0.8%
Aged 16 to 24 years	Social rented	16.5%	33.3%	28.7%	22.3%	3.7%	1.7%	-1.9%	-4.6%
	Private rented	50.0%	49.2%	55.0%	64.3%	-10.7%	-2.9%	0.0%	3.8%
	Owned	61.8%	48.6%	42.9%	38.7%	1.7%	-0.5%	-0.9%	-1.3%
Aged 25 to 34 years	Social rented	6.7%	16.0%	18.2%	17.6%	1.4%	-0.2%	0.5%	-0.3%
,	Private rented	31.5%	35.4%	38.9%	43.6%	-3.1%	0.7%	0.4%	1.6%
	Owned	68.3%	58.5%	56.1%	52.3%	-7.5%	-8.5%	-8.4%	-8.3%
Aged 35 to 44 years	Social rented	5.7%	13.8%	16.2%	17.5%	-0.1%	0.2%	0.9%	0.0%
, , , , , , ,	Private rented	26.0%	27.6%	27.6%	30.2%	7.6%	8.3%	7.5%	8.2%
	Owned	78.0%	67.6%	66.2%	62.4%	-6.1%	-7.4%	-7.6%	-8.1%
Aged 45 to 54 years	Social rented	5.3%	13.6%	15.5%	17.9%	-0.1%	0.6%	1.8%	1.6%
, , , , , ,	Private rented	16.7%	18.8%	18.3%	19.7%	6.2%	6.8%	5.8%	6.6%
	Owned	83.8%	73.8%	73.3%	69.9%	-5.8%	-5.7%	-5.8%	-6.0%
Aged 55 to 64 years	Social rented	6.0%	14.0%	14.9%	17.8%	1.6%	1.4%	2.2%	2.4%
youro	Private rented	10.2%	12.1%	11.8%	12.3%	4.2%	4.2%	3.6%	3.6%
	Owned	88.8%	78.3%	78.4%	75.1%	-1.9%	-2.3%	-1.5%	-1.2%
Aged 65 to 74 years	Social rented	5.1%	14.6%	14.3%	17.1%	0.6%	1.2%	0.1%	-0.2%
, 50.10	Private rented	6.1%	7.1%	7.2%	7.8%	1.3%	1.2%	1.4%	1.5%
	Owned	90.9%	82.8%	81.1%	78.8%	2.2%	5.0%	6.7%	5.9%
Aged 75 years and over	Social rented	4.2%	12.0%	13.4%	15.3%	-1.9%	-4.7%	-6.0%	-5.2%
4114 0101	Private rented	4.8%	5.2%	5.5%	5.9%	-0.3%	-0.2%	-0.7%	-0.7%

Source: Census 2011, Census 2021, Stantec analysis

<sup>&</sup>lt;sup>32</sup> There are some limitations to this data to be aware of. 'South Essex' data excludes Brentwood, for which data on HRP age and tenure was not available for 2021. The 2021 Census includes a '15 years and under' age category, but the 2011 Census does not so comparisons are not available – in any case, this is a very small group.



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# Castle Point Housing Needs and Demographic Report 6 Demographic and Housing Context

- 6.24 Castle Point roughly follows the national trend, though its ownership rates are higher than its comparators across the board, and the declines therein slightly smaller. Interestingly, younger households (16 to 24 and 25 to 34 years) buck the trend, with increases in the proportions owning a home.
- 6.25 This does not give a complete picture, however, as it only focuses on *those who have formed households*. The probability of people of each age group forming a household also needs to be considered. This is approximated by the number of households by age of HRP as a proportion of household population by age. This is estimated from the 2014-based household projections (1991-2039) and summarised for key years (Census years and 2039) in Table 6-6.
- 6.26 For ease of comparison, differences between rates in Castle Point and England are included at the end of the table (with age groups under 25 excluded these are very small in all cases). With the sole exception of those aged 55-64 in 1991, household formation rates in Castle Point are lower for all age groups and years. From 2021 onwards, differences are largest for the crucial 25-34 and 35-44 age groups (i.e. potential first-time buyers). Moreover, they are projected to grow in the future.

Table 6-6: Household formation rates, key years, and comparison of Castle Point to England

		1991	2001	2011	2021	2031	2039
England	Under 15	0.000	0.000	0.000	0.000	0.000	0.000
England	15 to 24	0.146	0.129	0.123	0.123	0.123	0.125
England	25 to 34	0.481	0.476	0.435	0.438	0.437	0.428
England	35 to 44	0.541	0.568	0.569	0.575	0.587	0.593
England	45 to 54	0.560	0.575	0.593	0.597	0.600	0.608
England	55 to 64	0.597	0.600	0.607	0.620	0.624	0.628
England	65 to 74	0.670	0.668	0.652	0.654	0.663	0.669
England	75 and over	0.787	0.788	0.785	0.762	0.758	0.755
England	Total	0.407	0.423	0.424	0.433	0.444	0.451
South Essex	Under 15	0.000	0.000	0.000	0.000	0.000	0.000
South Essex	15 to 24	0.118	0.111	0.097	0.100	0.102	0.106
South Essex	25 to 34	0.487	0.493	0.451	0.455	0.453	0.445
South Essex	35 to 44	0.541	0.568	0.561	0.565	0.576	0.579
South Essex	45 to 54	0.552	0.568	0.578	0.574	0.571	0.577
South Essex	55 to 64	0.591	0.590	0.587	0.599	0.597	0.595
South Essex	65 to 74	0.654	0.662	0.628	0.632	0.640	0.643
South Essex	75 and over	0.787	0.789	0.757	0.736	0.734	0.732
South Essex	Total	0.401	0.423	0.417	0.424	0.431	0.437
Castle Point	Under 15	0.000	0.000	0.000	0.000	0.000	0.000
Castle Point	15 to 24	0.085	0.065	0.059	0.064	0.065	0.069
Castle Point	25 to 34	0.450	0.433	0.384	0.377	0.372	0.359
Castle Point	35 to 44	0.519	0.539	0.525	0.520	0.529	0.533
Castle Point	45 to 54	0.534	0.543	0.560	0.550	0.545	0.552
Castle Point	55 to 64	0.597	0.579	0.561	0.582	0.577	0.577
Castle Point	65 to 74	0.642	0.660	0.614	0.608	0.621	0.621
Castle Point	75 and over	0.772	0.778	0.757	0.731	0.732	0.732



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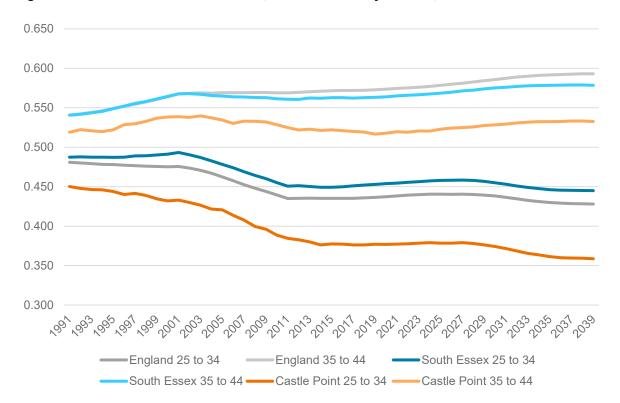
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		1991	2001	2011	2021	2031	2039
Castle Point	Total	0.383	0.411	0.417	0.427	0.434	0.438
C. Point vs Eng.	25 to 34	-0.031	-0.043	-0.051	-0.061	-0.065	-0.069
C. Point vs Eng.	35 to 44	-0.022	-0.029	-0.044	-0.055	-0.058	-0.060
C. Point vs Eng.	45 to 54	-0.027	-0.032	-0.032	-0.046	-0.054	-0.056
C. Point vs Eng.	55 to 64	0.000	-0.020	-0.046	-0.037	-0.047	-0.051
C. Point vs Eng.	65 to 74	-0.028	-0.008	-0.038	-0.046	-0.041	-0.048
C. Point vs Eng.	75 and over	-0.015	-0.010	-0.028	-0.031	-0.025	-0.023
C. Point vs Eng.	Total	-0.025	-0.012	-0.006	-0.006	-0.009	-0.013

Source: ONS 2014-based household projections, Stantec analysis

6.27 Figure 6-10 reinforces this point, focusing on the key 25-34 and 35-44 age groups. Household formation rates for Castle Point are below those for South Essex and England, the gaps have increased in recent decades, and are projected to persist and widen in future.

Figure 6-10: Household formation rates, 25-34 and 35-44 year-olds, 1991-2039



Source: ONS 2014-based household projections, Stantec analysis

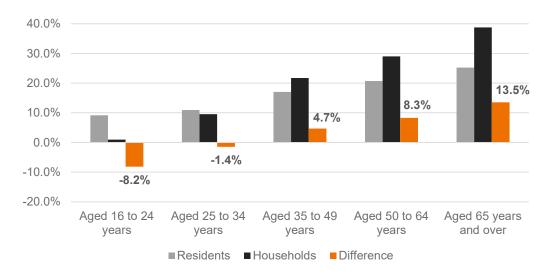
- 6.28 Finally, Figure 6-11, Figure 6-12, Figure 6-13, and Figure 6-14 look at residents and households (age of HRP) by age group for Castle Point and comparators. The difference shows the extent to which each age group is 'over' or 'under' represented in the household share. Note that those aged 15 years and under are excluded from the analysis their share of households is very close to 0% in all areas, as one would expect.
- 6.29 The most striking result is with respect to those aged 35 to 49 in Castle Point their degree of 'over-representation' is small, at 4.7%; in none of the comparators is it below 6.6%. This demonstrates that relevant to the sub-region, region, and country, those in their mid-thirties to



# Castle Point Housing Needs and Demographic Report 6 Demographic and Housing Context

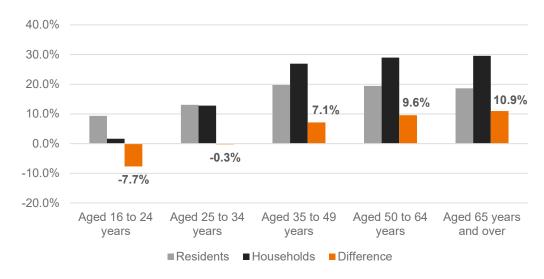
late forties in Castle Point are relatively unlikely to form their own households. A similar if less dramatic pattern can be seen for those aged 25 to 34, whilst those aged 65 and over represent a particularly high share of households in Castle Point.

Figure 6-11: Resident and household shares by age group, Castle Point



Source: Census 2021, Stantec analysis

Figure 6-12: Resident and household shares by age group, South Essex



Source: Census 2021, Stantec analysis

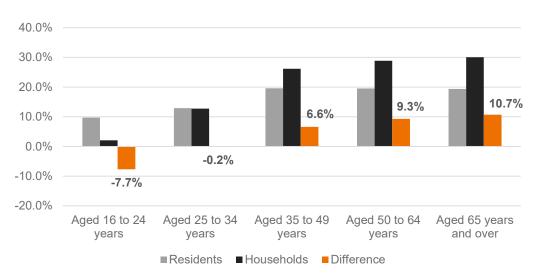


Figure 6-13: Resident and household shares by age group, East of England

Source: Census 2021, Stantec analysis

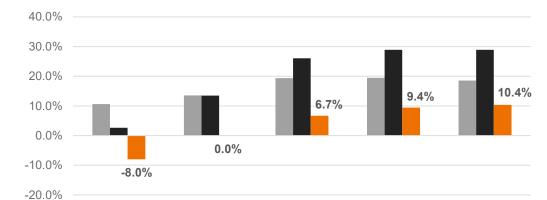


Figure 6-14: Resident and household shares by age group, England

Aged 25 to 34

years

Source: Census 2021, Stantec analysis

Aged 16 to 24

years

6.30 Overall, this analysis suggests that while home ownership rates in Castle Point are high – including among younger households – the ability of younger people in the district to actually form households is low, reflecting affordability and supply pressures.

Aged 35 to 49

years

■ Residents ■ Households ■ Difference

Aged 50 to 64

years

Aged 65 years

and over

#### **Key Points**

6.31 Analysis of ONS and Census data confirms that findings of the South Essex HNA still hold: Castle Point's population is growing slowly, with deaths projected to continue exceeding births; rate of housing stock additions remains low across South Essex but especially in Castle Point; house prices have risen rapidly and affordability ratios are high compared to the Eastern region.



# **Castle Point Housing Needs and Demographic Report** 6 Demographic and Housing Context

- 6.32 A high proportion (3.2%) of Castle Point's households are in caravans or similar structures, which further suggests a shortage of homes.
- 6.33 Whilst home ownership rates are high among households, household formation rates especially among younger age groups are comparatively low, suggesting that younger residents struggle to form their own households.



#### 7 Affordable Housing Need

- 7.1 Affordable Housing Need is reviewed in Chapter 6 of Turley's HNA 2022 and Chapter 5 of ORS's LHNA 2023. This chapter reviews and compares the two approaches and incorporates recent evidence.
- 7.2 To avoid confusion between the two assessments previously carried out, we henceforth refer to them as **Turley 2022** and **ORS 2023**.
- 7.3 The NPPF defines affordable housing as 'housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers)' (NPPF, Annex 2). It includes affordable housing for rent, starter homes, discounted market sales housing, and other affordable routes to home ownership (e.g. shared ownership).
- 7.4 The NPPF confirms that 'Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.' (NPPF, paragraph 63) and that these groups include those who require affordable housing.
- 7.5 Planning Practice Guidance provides further clarification on households to be included<sup>33</sup>:

'Strategic policy-making authorities can establish the unmet (gross) need for affordable housing by assessing past trends and current estimates of:

- the number of homeless households;
- the number of those in priority need who are currently housed in temporary accommodation:
- the number of households in over-crowded housing;
- the number of concealed households;
- the number of existing affordable housing tenants in need (i.e. householders currently housed in unsuitable dwellings); and
- the number of households from other tenures in need and those that cannot afford their own homes, either to rent, or to own, where that is their aspiration.'
- 7.6 This provides a useful starting point, though PPG notes caveats (the need to avoid double-counting and making sure to include only those households who cannot afford to access suitable housing on the market), and as ORS notes there is no guidance on how to assess the needs of households who can afford to rent but would prefer to own.

#### Turley 2022 and ORS 2023 approaches

7.7 This section summarises the Turley 2022 and ORS 2023 approaches to estimating affordable housing need, then discusses key differences between the two. For Turley 2022, most results

<sup>&</sup>lt;sup>33</sup> Housing and economic needs assessment - GOV.UK (www.gov.uk), PPG ID: 2a-020-20190220



given here are for Castle Point only, though their assessment was done for each of the six South Essex districts.

#### **Turley 2022**

- 7.8 **Current need** for affordable housing is based on data from councils' housing registers shared with Turley in summer 2021. Those assigned to the lowest priority bands were removed in order to focus on those in the greatest need.
- 7.9 This resulted in a current need of 463 households, of which 125 were existing affordable housing tenants (i.e. their current property did not adequately match their needs; once these needs are met elsewhere, the property would be freed up for another household in need). This is shown in their Table 6.1, reproduced below.

Table 6.1: Current Need for Affordable Housing (A)

Step and source	Basildon	Brentwood	Castle Point	Rochford	Southend- on-Sea	Thurrock	South Essex
A1 Existing affordable housing tenants in need Applications to transfer on housing registers	504	337	125	257	338	435	1,996
A2 Others on housing register Housing registers excluding above	845	692	338	719	798	241	3,633
A3 Total housing need currently A1 + A2	1,349	1,029	463	976	1,136	676	5,629

Source: Turley 2022, Table 6.1

#### 7.10 **Future need** consists of two elements:

- Newly forming households unable to afford market housing.
  - Gross annual household formation rate (by five-year age band) is estimated using inputs from Edge Analytics which assume standard method need is met. Estimates used are limited to those aged 44 or younger to more accurately reflect newly forming households only.
  - Costs of purchasing or renting at the lower quartile of the open market (based on Land Registry data) are compared to household incomes (using data from CACI for all households, whether newly-forming or not).
  - It is assumed that a household would be unable to afford market housing (i.e. in need of affordable housing) if these housing costs would exceed one third of its income.



- The annual costs of purchasing and renting lower quartile properties were estimated at £14,556 and £9,600 respectively (in Castle Point, as in all other districts, renting was more affordable than purchase). On this basis, 53% of newly-forming households would be unable to afford to purchase and 33% would be unable to afford to rent.
- Therefore, of 888 new households forming each year in Castle Point, 293
   (33%) would be unable to privately rent in the open market.
- Existing households falling into need. This incorporates data on households from tenures other than social rent either receiving lettings or registering need, using a three-year average. Annual need arising in this way is estimated to stand at 89.
- Total newly-arising need is therefore 381 per year (293 plus 89, after rounding).
- 7.11 **Total gross need** over the 19-year period to 2040 (as used in Turley 2022) is then estimated by adding current need to newly-arising need over 19 years. This comes to 7,705 or an annual 406.
- 7.12 **Supply of affordable housing** is based on the number that have become available to non-transfer tenants (three-year average), committed delivery, and homes which would be vacated by those currently in need of alternative affordable housing. In total, annual supply to 2040 is estimated at 80 homes.
- 7.13 **Net need** is therefore estimated at 326 households (406 minus 80) per year in Castle Point.

#### **ORS 2023**

- 7.14 **Current need of households unable to afford market housing** is assessed for a variety of categories using multiple sources and summarised in Figure 32 of ORS 2023. We reproduce this figure below.
- 7.15 Published P1E returns (now superseded by H-CLIC) underpin estimates of homeless households. Census 2021 is used for concealed households and those in overcrowded accommodation. CLG Local Authority Housing Statistics provide estimates of other households in unsuitable housing.
- 7.16 An estimated 175 households currently occupy affordable housing which would be freed up for others once their need was met therefore this supply is deducted from gross need to give a net figure.
- 7.17 Therefore, current need is estimated at 818 households gross and 643 net. The final column, unmet housing need, refers to households with no home (i.e. homeless or concealed rather than in accommodation which is overcrowded, temporary, etc.).



Figure 32: Assessing current unmet gross need for affordable housing (Source: CLG P1E returns, Census, EHS, LAHS)

	А	Affordable Housing					
CASTLE POINT	Gross Need	Supply	Net Need	unmet Housing Need			
Homeless households in priority need [Source: CLG P1E returns 2022]							
Currently in temporary accommodation in communal establishments (Bed and breakfast or Hostels)	23		23	23			
Currently in temporary accommodation in market housing (Private sector leased or Private landlord)	73		73				
Currently in temporary accommodation in affordable housing (Local Authority or RSL stock)	8	8	0				
Households accepted as homeless but without temporary accommodation provided	1		1	1			
Concealed households [Source: Census 2001 and 2021]							
Growth in concealed families with family representatives aged under 55	224		224	224			
Overcrowding based on the bedroom standard [Source: Census 2021 and English Housing Survey]							
Households living in overcrowded private rented housing	189		189				
Households living in overcrowded social rented housing	165	165	0				
Other households living in unsuitable housing that cannot afford their own home [Source: CLG Local Authority Housing Statistics 2022]							
People who need to move on medical or welfare grounds, including grounds relating to a disability	134	2	132				
People who need to move to a particular locality in the district of the authority, where failure to meet that need would cause hardship (to themselves or to others)	1	0	1				
TOTAL	818	175	643	248			

Source: ORS 2023, Figure 32

- 7.18 **Future need of households unable to afford market housing** is based on outputs of the ORS Housing Model, which provides annual changes in household numbers by age cohort.
- 7.19 The ORS housing model is used to predict key annual flows during 2023-2043:
  - New households forming or migrating to the area.
  - Households no longer present due to death or out-migration.
  - Existing households falling into or out of need.
- 7.20 These estimates are summarised in Figure 39 of ORS 2023, which is reproduced below.



Figure 39: Annual components of Household Growth Castle Point 2023-2043 (Source: ORS Housing Model)

CASTLE POINT 2023-2043		All households	Households able to afford housing costs	Households unable to afford housing costs
All new households		2,545	2,214	331
All households no longer present		2,306	2,026	280
Change in existing househo	lds	-	26	-26
Future affordable housing need 2023-2043	Annual average	+239	+215	+25
	20-year Total	+4,785	+4,294	+490

Source: ORS 2023, Figure 39

- 7.21 13% (331/2,545) and 12% (280/2,306) respectively of new households and households leaving the area are unable to afford their housing costs and therefore in need of affordable housing. ORS note that the 13% figure is consistent with their survey finding that 14% of newly-forming households were expected to seek social rented housing.
- 7.22 The future affordable housing need is therefore estimated at 490 households. Added to the current need of 643 total need among households unable to afford market housing is estimated at 1,133 (ORS Figure 45).
- 7.23 **Needs of households aspiring to homeownership** are estimated based on English Housing Survey data on the long-term tenure aspirations of households (i.e. proportions of households by composition and tenure which aspire to ownership) and data on households by type and age group living in private rented housing.
- 7.24 Therefore, this analysis concerns those who can afford market rent but want to own their own home instead. Those who cannot afford to buy are in need of affordable home ownership options. Note that Turley 2022's estimates do not include comparable figures. Although the NPPF included affordable routes to home ownership in its definition of affordable housing prior to the production of the South Essex HNA 2022 (for example in the 2019 NPPF<sup>34</sup>), it focuses only on those unable to access market housing at all.
- 7.25 ORS 2023 estimates that 1,579 such households exist at present, most of them in the 25-34 and 35-44 age groups (ORS Figure 44). A further 1,495 (75 per year) are projected to form between 2023 and 2043. This is based on an EHS survey on the growth of the private rented sector.
- 7.26 **Total need** is therefore initially estimated at 4,208 over the 20-year period, 3,075 of which is from households aspiring to home ownership and 1,133 of which relates to households unable to afford market housing.
- 7.27 The need from households aspiring to ownership is then adjusted to account for certain groups ineligible for or unable to access affordable ownership options. Again, this analysis uses the ORS Housing Model. Adjustments made are as follows:
  - 1,623 households ineligible for market ownership, either because they can afford
    market housing (and are therefore not in need) or because they require a 3-bedroom
    or larger property; even a 50% discount (the maximum possible under the First
    Homes scheme) on lower quartile properties of this size would not make them
    eligible. A breakdown between these two reasons is not provided, however only 107

<sup>&</sup>lt;sup>34</sup> National Planning Policy Framework 2018, The National Archives Annex 2: Glossary



1- and 2-bedroom properties are removed in this step, which suggests that the latter reason dominates.

- 769 households unable to afford properties at a 50% discount. Again, this
  focuses on prices for lower quartile properties, and those households with an
  insufficient income to afford mortgage repayments are removed.
- 436 households with savings of less than £5,000, assumed to be required for a
  deposit and other up-front costs.
- 7.28 This process leaves 247 (8%) of the initial 3,075 households, leading to an updated affordable housing need figure of 1,380, as shown below.

Figure 47: Overall need for Affordable Housing 2023-2043, including aspiring households able to access affordable home ownership, by property size (Source: ORS Housing Model. Note: Figures may not sum due to rounding)

	Affordable H	Affordable	
	Households unable Households aspiring to afford to home ownership		Housing (Households)
1-bedroom	201	93	294
2-bedrooms	315	154	469
3-bedrooms	453	0	453
4+ bedrooms	164	0	164
TOTAL HOUSING NEED	1,133	247	1,380

Source: ORS 2023, Figure 47

#### Comparing the Turley 2022 and ORS 2023 approaches

- 7.29 This section contrasts and critiques the methodology used in each assessment of affordable housing need.
- 7.30 We initially compare estimates for households unable to afford market housing only. This is because demand from households aspiring to home ownership is not explicitly considered in Turley 2022. This comparison is consistent with the one conducted by ORS (pages 69-70 of ORS 2023).
- 7.31 The ORS estimates of need from households aspiring to home ownership are then reviewed separately.

#### Households unable to afford market housing

- 7.32 Table 7-1 summarises key numbers from the two assessments. These are categorised into current need, future need, future supply, and total need (i.e. current plus future). The most important gross, net, and total figures are highlighted.
- 7.33 Most figures shown are annual (or total in the case of current need) for easy comparison. Plan period figures are included at the end for completeness, though we note that Turley 2022 considers a 19-year period and ORS 2023 a 20-year one.
- 7.34 Not all rows are populated for both assessments, as different components feature in assessments of future need and supply. Values taken directly from each report are accompanied by a reference to source table, figure, or page. Where Stantec has calculated a figure not included to aid comparison, it is highlighted in pale orange with the calculation with reference to other rows included.



Table 7-1: Comparison of Turley 2022 and ORS 2023 assessments of affordable housing need, households unable to afford market housing

_			Tur	ley 2022	OF	RS 2023
	а	Existing tenants	125	Table 6.1	175	Figure 32
Current need	b	Others	338	Table 6.1	643	Figure 32
Current need	С	Gross	463	Table 6.1	818	Figure 32
	d	Net	338	c-a	643	Figure 32
		Annual figures				
	е	New households	293	Table 6.3		
	f	Existing households into need	89	Table 6.3	69	Figure 38
Future need	g	Existing households out of need			-95	Figure 38
i utule lieeu	h	Newly forming households			118	Figure 34
	i	In-migration			212	Figure 34
	j	Gross	381	Table 6.3	400	f+h+i
	k	Emerging supply	8	Table 6.6		
	1	Lettings to new tenants	72	Table 6.6		
Future supply*	m	Dissolutions following death			110	Figure 37
	n	Out-migration			170	Figure 37
	o	Total	80	Table 6.6	280	Figure 37
Future need	р	Net	301	j-o	25	j-o+g
Total need	q	Gross	406	Table 6.4	441	j+c/20
Total fleed	r	Net	326	Table 6.7	56	Page 69
		Plan period				
Future need	S	Gross	7,242	Table 6.4	8,000	j*20
ruture need	t	Net	5,719	p*19	490	Figure 45
Total need	u	Gross	7,705	Table 6.4	8,818	q*20
Total fleed	٧	Net	6,194	r*19	1,133	Figure 45

Source: Turley 2022, ORS 2023, Stantec analysis

- 7.35 ORS 2023 estimates the current level of need, whether gross (c) or net (d), to be almost twice as high as Turley 2022 does.
  - Each assessment uses authoritative sources to estimate current need: Turley 2022 uses councils' housing registers, and ORS 2023 uses CLG returns and Census data.
  - Turley 2022 excludes Band D applicants from their assessment of need. These are sheltered housing applicants with 'sufficient' income and savings over £16,000 – therefore we would accept that their priority is low, and those in moderate, high, or urgent need, and those with emergency status, are included<sup>35</sup>.

<sup>&</sup>lt;sup>35</sup> Prioritising Applications - Homechoice (castlepointhomechoice.org.uk)



Project Number: 33313495200

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<sup>\*</sup> Dissolutions following death and out-migration may also include reductions in demand; discussed further below

- ORS 2023 takes a more expansive view of affordable housing need, which is welcome – for example by including growth in concealed families and those in overcrowded private rented housing.
- 7.36 Both assessments produce similar estimates of gross future need (j), with ORS just slightly higher<sup>36</sup>. As this is an annual rather than one-off figure, gross total need (q) is much more reactive to changes in future rather than current need.
  - Turley 2022 estimates (Table 6.3), based on Edge Analytics projections, that 888 (gross) new households will form each year. 293 (33%) of these will be unable to privately rent. This assumes 'that the income of newly forming households aligns with that of existing households, and that those unable to afford the cost of entry-level private rent will require affordable housing' (paragraph 6.17). The affordability benchmark used is one third of income.
  - ORS 2023 estimates (Figure 34), based on their housing model, that there will be 838 newly forming households and 1,708 migrating into the area each year. Of these, 118 (14%) and 212 (12%) respectively will be unable to afford housing costs. The affordability benchmark used is 35% of income.
  - The Turley 2022 'New households' figure is not directly comparable to the more disaggregated figure in ORS 2023. Turley confirm (paragraph 6.11) that gross annual household formation rates are estimated by comparing the number of households in specific five-year age bands to the numbers in the corresponding age band five years previously and are limited to households led by someone aged 44 or younger. Therefore it accounts for in- and out-migration and household dissolutions (among younger households).
  - ORS 2023 has a much smaller proportion of new households 13% rather than 33% in Turley 2022 estimated to be in affordable need.
  - In ORS 2023, the 1,708 in-migrating households and 1,352 out-migrating households (Figure 37) each year nets out at in-migration of 356 households each year. This is broadly consistent with the projection for 2023-2032 shown in Figure 6-3 of this report, i.e. net migration of 600-800 people per year (assuming a household size of around 2).
  - Given the similar income benchmarks for affordability used, the large difference in proportion of new households estimated to be in need of affordable housing is surprising. Whilst Turley 2022's assumption that their income aligns with that of existing households is a simplistic one, it is reasonable given the data available. The much lower proportion in ORS 2023 is based on the ORS Housing Model, and we do not have access to its inputs or assumptions.
  - An overarching difference is consistency or otherwise with standard method housing need.
    - Turley 2022 confirm that inputs calculated by Edge Analytics assume that the minimum need for housing suggested by the standard method is med (i.e. there is a dwelling-led household projection, further elaborated on in Appendix 3 of the Turley report.

<sup>&</sup>lt;sup>36</sup> The figure for ORS 2023 is 400 rather than 399 (69+118+212) as in Figure 34 of the report 118+212 sum to 331; presumably this is due to rounding and has been reflected here.



- O By contrast, the ORS 2023 figures appear to be compatible with their lower assessment of overall housing need ORS Figure 39 (reproduced above) shows a net increase of 239 households per year. This is slightly below the overall annual housing need figure estimated (255 vs 349 under standard method). As explained previously, we do not feel that 255 homes per year adequately addressed Castle Point's housing need, nor do we agree that there exist exceptional circumstances to justify an alternative method. Therefore, the starting point in the ORS 2023 assessment of affordable housing need is also too low.
- 7.37 ORS 2023 therefore estimates gross total need (q) to be somewhat higher by around 10% than Turley 2022 does though as discussed above, there are differences in approach which may make this comparison imperfect.
- 7.38 Considering net total need (r), however, Turley 2022's figure is some six times higher than ORS 2023's. This rather than gross need is key to determining the number of new affordable homes to plan for.
- 7.39 This apparent inconsistency can principally be explained with reference to future supply (o), as noted by ORS 2023 (paragraph 5.91).
- 7.40 Turley 2022 estimates (in their Table 6.6) that a total of 80 affordable dwellings will become available each year (this comprises committed supply, affordable homes vacated by those in need, and historic levels of lettings to new tenants).
- 7.41 ORS 2023 has a much higher figure, 280 dwellings per year. This is a combination of dissolutions following death (m) and out-migration (n) of households unable to afford market housing. Some of these households will free up affordable accommodation, though others will not be occupying it (i.e. in most cases they will be in the private rented sector instead), so their death or departure will represent a reduction in unmet demand, rather than an increase in supply as we cannot distinguish between the two, they have been included in future supply. This is acknowledged by ORS, who note:
  - "The model identifies the households that will migrate out of the area each year, including those households who are unable to afford their housing costs. A proportion of these will vacate rented affordable housing (which will become available for another household) whereas others that have not yet been allocated an affordable home will reduce the number of households waiting (it should be noted that some might have chosen to stay if housing costs were cheaper or more affordable housing was available)." (para 5.32)
- 7.42 The Turley 2022 figure of 80 dwellings per year is based on data supplied by councils. Moreover, lettings to new tenants must be made possible by existing tenants vacating their properties, so housing supply channels mentioned by ORS 2023 are included implicitly if not explicitly. As discussed previously, the 'New households' figure in Turley already includes outmigration by younger households.
- 7.43 A component which is shown as a reduction in demand in Table 7-1 is existing households climbing out of need (g). The ORS Housing Model estimates this at 95 households annually, exceeding the number of existing households falling into need (f) by 26.
- 7.44 Table 7-2 reviews the components of net future need in ORS 2023. For new and 'no longer present' households only, the annual average nets out at 51 new households in affordable need each year. Therefore, the impact of the 26 (net) existing households climbing out of need is significant, roughly halving the rate of increase in households unable to afford market housing to 25 per year. This has a major bearing on overall need estimated.



Table 7-2: Breakdown of future need in ORS 2023, annual

Newly forming households	118
Households migrating into the area	212
All new households	331
Household dissolutions following death	-110
Households migrating out of the area	-170
All households no longer present	-280
New/no longer present households only	51
Existing households falling into need	69
Existing households climbing out of need	-95
Existing households, net	-26
Future need, net	25

Source: ORS 2023 (Figures 34, 37, 38), Stantec analysis

- 7.45 We accept the logic set out (in para 5.35 of ORS 2023) that established households' circumstances can improve, e.g. due to couples forming or households getting older (and presumably increasing their earnings). Without knowing the assumptions driving these results, however, we cannot be confident that they are robust and the overall rate of change is quite sensitive to them<sup>37</sup>.
- 7.46 Turley estimates that 89 households fall into need each year (Table 6.3). Their methodology is based on lettings to or registrations of need from tenures other than social rent, so is based on hard data rather than model outputs. We do not have access to the inputs or assumptions of the ORS model, so cannot verify its robustness. In the ORS estimates, 89 rather than 69 households falling into need each year would nearly double net future need from 25 to 45.
- 7.47 Any households climbing out of need are likely to be those whose circumstances take them from one side of a cut-off point to another, e.g. from 'just' in affordable housing need to 'just' outside it. Therefore, their alternative to affordable housing is likely to be in the private rented sector (PRS) rather than home ownership, which generally requires higher income and savings. The disadvantages of growing the PRS are discussed in a later subsection of this report.

#### Households aspiring to home ownership

7.48 We now review the ORS 2023 estimates of need arising from households who can afford to rent but not to buy and aspire to do so. These are summarised in ORS Figure 46, reproduced below.

<sup>&</sup>lt;sup>37</sup> For example, if the number of existing households climbing out of need fell from 95 to 79 per year (a decrease of **11**%), net change in existing households unable to afford housing costs would move from -26 to -16. Overall change in households unable to afford housing costs would then be +35 (331 new households, 280 no longer present, 16 net climbing out of need) – an increase of **40**%.



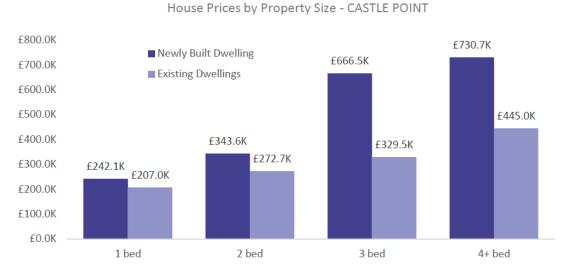
Figure 46: Aspiring affordable homeownership housing mix by household affordability 2023-2043 (Source: ORS Housing Model)

	All households aspiring to home ownership	MINUS households ineligible for affordable market home ownership	Households unable to afford market home ownership	MINUS households unable to afford 50% of new build LQ	Households able to afford 50% of new build LQ	MINUS households with savings of less than £5,000	Households able to afford 50% of new build LQ and have savings of £5,000 or more
1-bedroom	428	35	394	181	212	119	93
2-bedrooms	1,130	72	1,058	588	471	317	154
3-bedrooms	1,086	1,086	0	0	0	0	0
4+ bedrooms	431	431	0	0	0	0	0
TOTAL	3,075	1,623	1,452	769	683	436	247

Source: ORS 2023, Figure 46

- 7.49 The initial estimate of households in this group, 3,075, draws on the English Housing Survey. Therefore, this provides a good starting point.
- 7.50 All households requiring a 3-bedroom or 4+-bedroom property are eliminated on the grounds that given the prices of lower quartile new-build properties in Castle Point, they would not be eligible for the 'First Homes' programme even with the maximum 50% discount. Given that there are 1,086 3-bedroom households and 431 4+-bedroom households aspiring to ownership, over half of the initially estimated need is removed.
- 7.51 Presumably some 3- and 4+-bedroom properties would have otherwise been removed on the grounds that they can afford market housing anyway; though the small number of 1- and 2-bedroom households removed suggests that these would have been few in number.
- 7.52 ORS estimates of lower quartile prices paid in Castle Point by number of bedrooms and newly built/existing dwellings are shown in their Figure 14, replicated below. It is immediately apparent that new-build 3+ bedroom homes in Castle Point command very significant premia relative to smaller and existing properties (a newly built 3-bedroom property costs 94% more than a newly built 2-bedroom property and 102% more than an existing 3-bedroom property).
- 7.53 The ORS analysis is based on ONS, Bank of England, VOA, and Land Registry data. We have not replicated it here. We would however question whether the data merely reflects very few properties being built in Castle Point, and therefore commanding a significant premium. Moreover, the 3+ bedroom properties recently built in the district may not be typical of those that would be provided under 'First Homes' or similar schemes, i.e. more compact or affordable, but could be luxury developments that command higher prices for other reasons.





Source: ORS 2023 (Figure 14)

- 7.54 The subsequent stage of analysis removes households whose income means they would be unable to afford at 50% of open market values; again, over half (769/1,452) of the remaining households are removed in this way.
- 7.55 The final stage removes some two thirds (436/683) of the remaining households as they have savings below £5,000, the assumed requirement to make a deposit and cover other upfront costs.
- 7.56 A limitation of the ORS 2023 analysis here is that it focuses on First Homes with a 50% discount as an affordable home ownership option. Shared Ownership also provides a route to home ownership, and one which may be more affordable or feasible for some households.
- 7.57 Rent and service charges may make the monthly cost of a Shared Ownership property higher than a comparable First Homes property, so those households whose income is too low would not be helped by their availability. Initial share purchased can be as low as 10%, however, lowering deposit requirements. Therefore, some households unable to access a First Home due to insufficient savings may be able to access a Shared Ownership property.
- 7.58 There is no price cap on properties for Shared Ownership. Therefore, even if 3- or 4+- bedroom homes cannot be brought under the £250,000 First Homes cap, Shared Ownership could be an option for these larger households requiring more expensive properties.
- 7.59 The consequence of under-provision of affordable home ownership options is to force more households into the PRS. By definition, the households considered here can afford market rents, so would not be included in the need for affordable rented housing. Most of them cannot afford market ownership the exception is those who are excluded because they can. If social and owner-occupied housing are not available to these households, the only option left to them will be the PRS. The consequences of growing the PRS are discussed in a later subsection of this report.
- 7.60 Due to the way the ORS 2023 analysis is structured, isolating those households who can afford market housing is not possible, as all those ineligible for affordable home ownership (whether because they can afford market ownership anyway, or because they require a 3-bedroom or larger property) are removed at once, as shown in ORS Figure 46 (above).
- 7.61 The 7% (107/1,558) 1- and 2- bedroom households removed at this stage must be removed because they can afford market ownership. Assuming that the same proportion of 3-bedroom



- or larger households were removed for the same reason, this accounts for just 104 of the 1,517, leaving 1,413 removed due to larger homes being too expensive (on the ORS analysis) for the First Homes scheme.
- 7.62 Therefore, of the 3,075 households aspiring to home ownership, 211 (estimated) are removed because they will be able to afford market ownership and do not need an affordable option. ORS estimates the effective demand at 247, and states that 'it would seem appropriate to only plan for the needs of those 247 households likely to form an effective demand'. If this advice is followed, it will leave 2,617 households who aspire to home ownership, cannot afford market home ownership, and would not have affordable options provided (ownership or rental), as shown in Table 7-3. It is highly likely that these households would have to privately rent.

Table 7-3: Unmet demand from households aspiring to home ownership in ORS 2023, households

Bedrooms	1	2	3	4+	Total
All households aspiring to home ownership	428	1,130	1,086	431	3,075
Ineligible - can afford market ownership	35	72	75	30	211
ORS effective demand	93	154	0	0	247
Unmet demand	300	904	1,011	401	2,617

Source: ORS 2023 (Figure 46), Stantec analysis

3 and 4+ bedroom households able to afford market ownership estimated from rate observed for 1 and 2 bedroom households

7.63 These 2,617 households amount for roughly 6% of those projected to exist in Castle Point at the end of the plan period. This is therefore a substantial element of the overall household mix in the district. Whilst we acknowledge that it may not be feasible to provide affordable housing options for all households aspiring to ownership unable to afford, we consider the ORS estimate of effective demand to be an underestimate<sup>38</sup>.

#### Overall housing delivery to meet affordable housing need

- 7.64 Stantec has analysed Census and DLUHC data on gross affordable housing stock and additions<sup>39</sup>. The change in stock over time gives us the *net* additions which have taken place. The difference between this and gross additions (the number actually built or converted) gives us the number of affordable stock losses i.e. to demolition or Right to Buy.
- 7.65 This analysis shows that over the last 10 years, the net change in Castle Point's affordable housing stock was 128 units, and the gross additions stood at 168. Data from Castle Point's

<sup>&</sup>lt;sup>39</sup> Live tables on affordable housing supply - GOV.UK (www.gov.uk)



<sup>&</sup>lt;sup>38</sup> In the 2014-based household projections, 43,087 households are projected for Castle Point in 2039 (the last year for which projections are available). 2,617 is 6.1% of this.

Authority Monitoring Report, replicated below, shows a similar picture for gross affordable homes delivered.

Figure 15: Number of Affordable Homes Delivered (gross)

Year	Social Rent	Intermediate	Affordable Rent	Total
2011/12	17	-	-	17
2012/13	22	-	-	22
2013/14	-	-	-	0
2014/15	25	15	15	55
2015/16	-	-	19	19
2016/17	3	4	9	16
2017/18	0	18	7	25
2018/19	2	0	0	2
2019/20	0	0	0	0
2020/21	13	0	0	13
2021/22	0	0	0	0
TOTAL	69	37	50	169

Source: Castle Point Authority Monitoring Report 2021-2022

- 7.66 Therefore, net additions as a proportion of gross stood at 76% for every four homes added to the affordable housing stock, one was lost. In absolute terms, four units were lost each year. This means that achieving a given net increase in affordable housing stock will inevitably require a greater gross increase.
- 7.67 Moreover, there are practical limitations on the proportion of housing stock delivered that can be affordable. In the now-abandoned Castle Point local plan, a headline affordable housing delivery rate of 40% was put forward, though only for proposals of 10 units or more, and with rates of 15-40% for Canvey Island (reflecting higher groundwork costs)<sup>40</sup>.
- 7.68 Further analysis of DLUHC data shows that over the 2012-2023 period, just 10% of Castle Point's housing delivery was of affordable units. Therefore the 40% target represents a very significant uplift on realised past performance.
- 7.69 Historic stock losses and historic/targeted delivery rates are applied to the Turley 2022 and ORS 2023 targets for net affordable additions in Table 7-4.
- 7.70 This analysis considers two scenarios for stock losses, both based on historic trends: A, that they run at 24% of affordable additions (i.e. 76% are retained); B, that 4 units are lost each year.
- 7.71 For affordable delivery as a percentage of total, two scenarios are also considered: 1, 10% based on historic trends; 2, 40% based on the target in the local plan.
- 7.72 In both cases, the 'true' answer probably lies in between the two scenarios. As the affordable housing stock increases, absolute losses will start to exceed 4 per year, but will not necessarily be 24% from the start (new tenants of social housing are unlikely to be able to immediately exercise their Right to Buy / Right to Acquire; i.e. to a large extent stock losses are a function of historic rather than recent additions). Given the caveats around small sites

<sup>40</sup> download.cfm (castlepoint.gov.uk) Paragraphs 9.38-9.41



- and Canvey Island, plus historically much lower delivery, 40% affordable housing is unlikely to be achieved across the district.
- 7.73 Four outcomes A1, A2, B1, and B2 for total housing delivery are therefore presented at the end of the table.

Table 7-4: Gross affordable and total additions required to meet affordable housing targets, annual and plan period

			Turley	, 2022	aspi	23 (excl. ring wners)	ORS 202	3 (total)
			Annual	Plan period*	Annual	Plan period	Annual**	Plan period
Net affordable add	itions require	d	326	6,520	56	1,133	69	1,380
Historic affordable	A as % of gr	oss			24	4%		
stock losses	B units/ye	ar				4		
Gross affordable a	additions	Α	428	8,553	73	1,486	91	1,810
required by sce	enario	В	330	6,593	60	1,206	73	1,453
Affordable delivery	1 Histori	C			10	0%		
as % of total	2 Target				40	0%		
		A1	4,076	81,516	700	14,165	863	17,253
Total gross additions	required by	A2	1,069	21,383	184	3,716	226	4,526
scenarios		B1	3,142	62,832	568	11,490	692	13,844
		B2	824	16,482	149	3,014	182	3,632
		A1	116	8%	20	1%	247	7%
As % of standard	method	A2	30	6%	53	3%	65	%
need***		B1	90	0%	16	3%	198	3%
		B2	23	6%	43	3%	52	%

Source: Turley 2022, ORS 2023, Census 2021, DLUHC, Stantec analysis

- 7.74 The results are, unsurprisingly, highly sensitive to whether 10% or 40% affordable delivery is achieved. Focusing on scenarios A2 and B2 (i.e. with 40% delivery), the ORS 2023 affordable housing target (1,380 over the plan period, including aspiring homeowners) is achievable well within standard method delivering 52-65% of it would achieve the target.
- 7.75 For reasons discussed earlier in this chapter, we strongly prefer the Turley 2022 estimate of affordable housing need and given that it does not include aspiring homeowners, it is still on the low side. Achieving the 326 affordable units per year, or 6,520 over the plan period, that it calls for would require that more than double standard method need be achieved and this is assuming blanket 40% affordable delivery and stock losses remaining at four units per year.
- 7.76 Turley 2022 estimated that achieving 2,412 affordable homes per annum across South Essex would require delivering 7,937 total dwellings each year roughly 70% above standard method need of 4,691 (Turley 2022, paragraph 6.32). This assumed a blanket 35% affordable housing delivery and made no allowance for stock losses.



<sup>\*</sup> Assuming 20-year rather than 19-year plan period for consistency

<sup>\*\*</sup> No annual figure including aspiring homeowners provided by ORS; plan period figure divided by 20

<sup>\*\*\*</sup> Calculated using annual estimated requirements compared to annual standard method figure (349)

#### Implications of a growing private rented sector

- 7.77 For the reasons argued above, Stantec feels that estimates of affordable housing need in the 2023 LHNA produced by ORS, both for those who cannot afford market rent and for those aspiring to homeownership, are very cautious.
- 7.78 The result of underproviding social rented and affordable ownership options will be for more households to remain in the private rented sector (PRS). Some of them (namely those unable to afford market rents from their own income) will also be relying on housing benefit. Others will aspire to ownership but be unable to achieve this without sufficient affordable options.
- 7.79 There are clear downsides to relying on the PRS as a 'go-to' option, but for those unable to buy or access social rented properties, it is the likely result. A recent LSE report<sup>41</sup> highlights some issues related to this:
  - As the PRS share of tenure in England has grown (from 11.5% in 1979, changing little until 1996 and the introduction of Buy to Let Mortgages, to almost one in five households today), so too has the profile of tenants and the length of occupancy. More private renters are families and those in middle age, and average length of tenancy is now 4.3 years. Despite this, contracts in the PRS are generally short-term (six or twelve months) and tenure remains insecure. Higher house prices and stringent mortgage requirements mean that for many more households than previously, ownership is not an option.
  - One third of PRS tenants are claiming housing benefit. This reflects that for many households, private rents are not affordable, and represents a significant cost to the taxpayer.
  - After accounting for benefits, social tenants pay roughly 15% of their incomes in rent; this is similar to the proportion spent on mortgage payments by those who own with a mortgage. Private tenants, however, spend nearly 25% of their incomes on rent (and much more in some contexts). This makes covering day-to-day expenses like food and energy – let alone saving for a deposit on a property purchase – more difficult.
- 7.80 The likely result of a cautious approach to affordable housing provision (and for that matter, overall housing provision) is that large, possibly increasing, numbers of households are left with no alternative to the PRS including those who cannot afford market rents. Whilst the PRS has an important role to play in the housing market, for many households, affordable rental or ownership options are more appropriate. These properties should be provided in sufficient numbers to meet their needs.

#### **Key Points**

- 7.81 Turley 2022 and ORS 2023 produce similar estimates for gross affordable housing need over the plan period arising from households unable to afford market housing.
- 7.82 The estimated *net* need from ORS 2023 is dramatically lower, however. This is driven by different assumptions on affordable housing becoming available due to households ceasing to occupy or need it (i.e. housing supply).

<sup>&</sup>lt;sup>41</sup> LSE-A-Road-Map-to-a-Coherent-Housing-Policy.pdf (housinglin.org.uk)



- 7.83 We consider that the Turley 2022 estimates adequately account for households vacating affordable housing, and are based on robust data supplied by councils. The higher ORS 2023 figures for housing supply are outputs of their proprietary model and therefore cannot be scrutinised in detail. We also note that the final result is very sensitive to households falling into or climbing out of need.
- 7.84 ORS 2023 also estimates need arising from those aspiring to home ownership. We consider these estimates to be overly cautious, mainly because affordable ownership options other than First Homes are not explicitly considered and the prices used for 3- and 4+-bedroom homes appear to be very high.
- 7.85 Considering historic loss rates of affordable housing stock, and historic/targeted delivery, achieving the affordable housing need estimated by Turley (which we consider to be stronger) would require comfortably exceeding standard method housing need overall.

**(** 

#### 8 Appendix: The National Housing Crisis

- 8.1 This section addresses the national housing crisis and its proposed solutions, through examination of the policy landscape, Government statements and speeches, and published research.
- 8.2 Housing need manifests itself in a variety of ways, including overcrowding, affordability issues, younger people living with their parents for longer, reduced labour mobility, and increased homelessness. It affects people of all ages.

#### Government policy and position

- 8.3 The national housing crisis has remained one of the Government's highest priorities for several years.
- The Theresa May-led Conservative Government elected in 2017 had a manifesto pledge to fulfil a 2015 commitment of delivering 1 million homes by the end of 2020 and half a million more by 2022 (i.e. the anticipated end of the Parliament). The Autumn Budget 2017 set out an ambition 'to put England on track to deliver 300,000 new homes a year'.
- In 2017, the White Paper *Fixing our broken housing market* set out plans to increase housing supply. These included new capacity funding for local authority planning departments, a simplified plan-making process, and increased abilities to take action against developers not building out once permissions are granted. It also proposed streamlined determination of applications, encouragement of modern methods of construction, and promotion of competition in the construction industry. Funding for affordable homes, to support housing associations, was also announced. A consultation on this White Paper was held, with the response published in March 2018.<sup>4243</sup>
- 8.6 A separate 2017 consultation, *Planning for the right homes in the right places*, consulted on changes to the planning system.
- 8.7 In July 2018 the National Planning Policy Framework (NPPF) was updated (with minor amendment in February 2019) in response to the outcome of these consultations. A key change was the introduction of the standard method of calculating housing need.<sup>44</sup>
- 8.8 The following Conservative Government elected in 2019 and led by Boris Johnson pledged to continue progress towards the 300,000 target and rebalance the market towards greater home ownership.
- 8.9 That government diagnosed the planning system as central to the failure to build enough homes, especially in areas where housing need is at its most severe. To that end, the Planning White Paper *Planning for the Future* was published in August 2020.
- 8.10 This paper included ten overarching proposals. They included 45:

<sup>&</sup>lt;sup>45</sup> Planning for the future - GOV.UK (www.gov.uk)



<sup>&</sup>lt;sup>42</sup> Fixing our broken housing market, February 2017, DCLG.

<sup>&</sup>lt;sup>43</sup> Fixing our broken housing market: consultation, March 2018, MHCLG.

<sup>&</sup>lt;sup>44</sup> What next for planning in England? The National Planning Policy Framework, June 2019, House of Commons Library.

# Castle Point Housing Needs and Demographic Report 8 Appendix: The National Housing Crisis

- Categorising all land into 'growth', 'renewal', and 'protected' areas.
- A single, simplified 'sustainable development' test for Local Plans.
- A standard method for establishing housing requirement figures to ensure enough land is released where affordability is worst.
- Faster and more certain decision-making for planning applications.
- 8.11 These proposed reforms were dropped in 2021 following the Government's defeat in the Chesham and Amersham by-election, in which opposition to the planning reforms was cited as a key reason for the outcome.
- 8.12 The Truss Government proposed significant planning reforms, including the creation of designated investment zones. 46 These did not come to fruition, however.
- 8.13 Under the Sunak Government, the Levelling Up & Regeneration Bill was introduced, outlining rather less ambitious reforms. It received Royal Assent, becoming the Levelling Up and Regeneration Act. in October 2023.
- 8.14 The planning-related provisions of the 2023 Act include 4748:
  - Enhanced digitisation of planning services and standards for planning data.
  - Increased weight for development plans in the decision-making process and clarification on what they should include.
  - New provisions for the protection of heritage assets; placeholder provision for 'street vote' powers (enabling residents on a street to bring forward extension or redevelopment proposals in line with their preferences, to be voted on by residents).
  - New routes for nationally-important development on Crown Land.
  - Increased flexibility on minor amendments to planning permission
  - Enhanced powers for enforcement of planning controls.
  - Introduction of an Infrastructure Levy (replacing the Community Infrastructure Levy outside London), allowing for a wider variety of approaches to rate-setting though it will not be mandatory.
  - Enabling the Secretary of State to specify outcomes relating to environmental protection.
  - Enabling local authorities (or groups thereof) to create Urban Development Corporations
  - Modest reforms to compulsory purchase procedures.

<sup>&</sup>lt;sup>48</sup> Royal Assent for the Levelling-up and Regeneration Bill (rics.org).



<sup>&</sup>lt;sup>46</sup> <u>Liz Truss set to overhaul planning laws to end central targets in bid to build more homes</u> (inews.co.uk)

<sup>&</sup>lt;sup>47</sup> Levelling-up-and-regeneration-bill-and-policy-paper-Summary-by-Town-Legal.pdf (townlegal.com)

#### Castle Point Housing Needs and Demographic Report 8 Appendix: The National Housing Crisis

- 8.15 Overall, it advanced a cautious set of changes, in contrast to the more fundamental reforms in *Planning for the Future*. Amendments proposed by the Government would have abolished 'nutrient neutrality' requirements, which was expected to unlock significant additional housebuilding. This was rejected by the House of Lords, however.<sup>49</sup>
- 8.16 Separately, geographically-focused schemes most prominently Cambridge New Quarter have also been proposed.
- 8.17 The NPPF was updated twice in 2023, first in September then in December. The changes made in September related principally to development of onshore wind turbines. In December, more substantial updates were made following the Levelling-up and Regeneration Bill. The key changes are 5051:
  - Clarification that standard method is an advisory starting point, with exceptional circumstances and robust evidence needed to justify an alternative approach.
  - Removed an implied requirement for authorities to consider revision of green belt boundaries in order to meet their development needs.
  - Removes a requirement for five-year housing supply to be updated annually where an up-to-date local plan is in place and contains a deliverable supply.
  - Local Planning Authorities with an up-to-date plan (less than five years old) are no longer required to annually identify and update a five-year housing land supply.

#### Factors influencing housing affordability

- 8.18 The most common and widely-used measure of housing affordability is the house price to earnings ratio generally using workplace-based earnings and median or lower quartile figures for prices and earnings. These ratios are published by the ONS, updated annually.<sup>52</sup>
- 8.19 This measure has several advantages: it combines prices with a measure of ability to pay and is easy to calculate and interpret. It features in the standard method for calculation of housing need: the baseline is adjusted according to the recent change in affordability ratio.
- 8.20 In response to recent inflationary pressures, the Bank of England repeatedly increased its base rate during 2022 and 2023 (see Figure 8-1). This follows a sustained period of very low rates, by historical standards, in the aftermath of the 2008 financial crisis and during the Covid-19 pandemic. From the 19<sup>th</sup> of March 2020 to the 16<sup>th</sup> of December 2021, it stood at just 0.1%. The most recent increase, on the 3<sup>rd</sup> of August 2023, took it to 5.25%.<sup>53</sup>

<sup>&</sup>lt;sup>53</sup> Interest rates and Bank Rate, Bank of England.



<sup>&</sup>lt;sup>49</sup> Nutrient neutrality and housing development - House of Commons Library (parliament.uk)

<sup>50 11</sup> Chief Planners Newsletter Dec 2023.pdf (publishing.service.gov.uk)

<sup>&</sup>lt;sup>51</sup> Not just housing: the December 2023 NPPF revisions (lichfields.uk)

<sup>52</sup> House price to workplace-based earnings ratio - Office for National Statistics (ons.gov.uk)



Figure 8-1: Official Bank Rate, %

Source: Bank of England

- 8.21 Data on residential loans from the FCA shows how, in line with the Bank's base rate, mortgage interest rates fell after 2008, and rapidly climbed during 2022 and 2023. Figure 8-2 illustrates this.<sup>54</sup>
- 8.22 Higher interest rates exert downward pressure on housing prices. In September 2023, the UK experienced its first annual fall in house prices (albeit by just 0.1%) since April 2012. 55 This is reflected in the analysis of house prices and affordability in Castle Point and comparators earlier in this report.

<sup>&</sup>lt;sup>55</sup> UK House Price Index: September 2023, ONS.



Project Number: 33313495200

<sup>&</sup>lt;sup>54</sup> Mortgage lending statistics - September 2023, FCA.

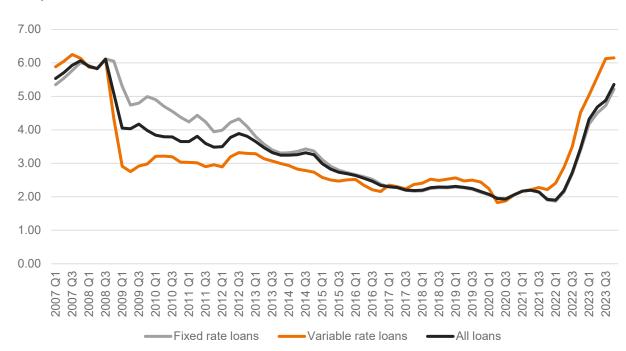


Figure 8-2: Residential loans to individuals, gross advances, overall weighted average interest rates, 2007-2023

Source: Bank of England, FCA

- 8.23 House prices are expected to continue falling in 2024, before continuing to increase in 2025. Savills forecasts a fall of 3.0% in 2024; Lloyds expects prices to fall by 5.0% over the course of 2023, with a further 2.4% decline in 2024. The April 2023 housing market forecasts from the OBR anticipate quarterly falls in house prices until 2025 Q1. 58
- 8.24 Taken at face value, lower affordability ratios brought about by higher interest rates imply lower housing need under the standard method than those calculated at present.
- 8.25 In practice, however, most house purchases rely heavily on borrowing. Indeed, interest rate rises drive house prices by increasing borrowing costs and therefore reducing how much potential buyers are able to pay.<sup>59</sup>
- 8.26 Falling house prices represent an opportunity for cash buyers and those who only need to borrow a small proportion of overall cost, for example those who have equity from the sale of an existing property or those later in life who are 'downsizing'. For those who must take out a large mortgage, higher interest rates have a countervailing impact and the larger their borrowing requirement, the larger this effect. First-time buyers and lower-income households are less likely to be able to save large deposits, so will rely more heavily on borrowing. The cost of higher interest rates will therefore significantly if not entirely offset the benefit of lower purchase prices for those most affected by the housing crisis.

<sup>&</sup>lt;sup>59</sup> In addition to the more general effect of incentivising saving and disincentivising borrowing, through which interest rates affect inflation more generally.



<sup>&</sup>lt;sup>56</sup> Residential Property Market Forecasts, Savills,

<sup>&</sup>lt;sup>57</sup> UK house prices will not stop falling until 2025, Lloyds predicts, October 2023, The Guardian.

<sup>&</sup>lt;sup>58</sup> Housing market, Office for Budget Responsibility.



# **Appendix 2: Completions and Dwelling Stock Data**

Table 122 Net additional dwellings by local authority district, England 2001-02 to 2022-23

This worksheet contains one table. All figures are unrounded. Some cells refer to notes which can be found in the Notes sheet. Cells in the first three columns in rows with a heading have been left blank. Cells filled in red are imputed figures.

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3 [p] 9 16]	234,397	341	177	222	1,088	156	495
2022-23 [note	234						
2021-22 [r] [note 15]	234,462	489	319	438	1,081	205	456
2020-21	217,754	329	268	371	792	141	348
2019-20	248,591	310	633	514	830	44	346
2018-19	247,766	584	483	394	480	173	261
2017-18 inote 14]	228,170	613	932	395	437	133	298
_	223,234	572	678	466	237	84	115
2015-16 note 12]	195,534	314	786	870	469	88	158
2014-15 note 11]	176,582	277	384	732	355	177	330
2013-14 note 10]	142,494	204	398	173	128	140	242
2012-13 [note 9] [	130,611	346	386	669	123	82	32
2011-12 [note 8]	140,785	420	418	703	247	26	92
2010-11 [note 7]	137,394	226	201	215	290	451	25
2009-10 note 6]	144,870	278	-	511	220	125	26
2008-09 2 [note 5] [	182,767	454	43	521	484	124	112
2007-08 [note 4]	223,534	373	75	358	770	115	180
2006-07 ; [note 3] [	214,936	582	326	226	800	118	429
2005-06 ; inote 2]	202,653	749	652	516	649	307	272
2004-05	185,553	620	1,080	178	835	219	89
2003-04	170,969	446	398	204	681	83	192
2002-03	159,875	513	870	316	784	183	171
2001-02	146,704	489	819	168	789	181	139
Authority Data	England	Southend-on-Sea UA	Thurrock UA	Basildon	Braintree	Castle Point	Rochford
DCLG code		D1590	M1595	V1505	Z1510	M1520	B1550

# Table 128: Dwelling stock estimates by local authority district: 2001 - 2022 At 31 March

																					Number	f dwellings
On 31st March	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
ENGLAND	21,206,812	21,353,516	1,513,391	21,684,360	21,869,913			22,511,036	22,693,802	22,838,672	22,976,066	23,116,851 2	23,247,462 23	23,389,956 2:	23,566,538	23,762,072	23,985,307	24,213,477 2	24,461,243	24,709,834	24,927,588	25,160,404
Southend-on-Sea UA	73,871	74,360	74,873	75,320	75,940		77,271		78,098	78,377	78,603	79,023	79,369	79,574	79,851	80,165	80,737	81,350		82,245	82,574	83,063
Thurrock UA	59,405	60,224	61,094	61,492	62,572		63,549		63,667	63,668	63,869	64,287	64,673	65,072	65,456	66,242	66,920	67,852		68,969	69,537	958'69
Basildon	70,821	70,989	71,305	71,508	71,686		72,428		73,306	73,817	74,032	74,735	75,433	75,606	76,337	77,207	77,672	78,067	_	78,974	79,344	79,782
Brentwood	29,727	29,727 29,922	30,192	30,418	30,583	30,712	30,943	31,201	31,477	31,660	32,067	32,230	32,476	32,612	32,803	32,945	33,126	33,371	33,613	34,040	34,239	34,646
Castle Point	35,774	35,955	36,138	36,222	36,441		36,866		37,106	37,231	37,682	37,708	37,793	37,933	38,110	38,198	38,281	38,414		38,631	38,772	38,977
Rochford	32.701	32.840	33.011	33.203	33.271		34.003		34.295	34.392	34.444	34.536	34.568	34.809	35.139	35.297	35.412	35.710	_	36.316	36.664	37.120

1 Figures from 2001; 2011 and 2021 are census figures. All figures from 2002 to 2021 have been revised following the release of the dwelling count from the 2011 and 2021 census. 2 Data from 2003, 2003 and 2004 consists a number of imputed and adjusted values and should not be considered as robust as subsequent years.

S Regional and national bulks are expressed to the nearest flouted rich design but should not be regarded as accurate to the nearest thousand design but should not be regarded as accurate to the nearest thousand design but should not be regarded as accurate to the nearest thousand design but should not be regarded as accurate to the nearest thousand but should not be regarded as a accurate to the nearest floating but should not be regarded as a person of the nearest thousand but should not be regarded by the nearest floating but should not be regarded as a person of the nearest floating but should not be regarded as a person of the nearest floating but should not be regarded as a person of the nearest floating but should not be regarded as a person of the nearest floating but should not be regarded as a person of the nearest floating but should not be regarded as a floating but should not be regarded as a floating but should not be regarded as a floating but should not be regarded as an included on the previous geographic basis.

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Source: Census 2001, Census 2011, Census 2021, Housing Flows Reconciliation, the Greater London Authority and Regional Assembly joint returns.

Latest update: 23 May 2023 Next update: May 2024

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