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Dear Terry

Land east of Rayleigh Road, Thundersley – planning application reference 23/0085/OUT

Further to my letter regarding the recent Manor Trading Estate appeal decision (and additional appeal decisions in Little Chalfont and Warlingham), I am writing to you with regard to the recent appeal decision on land rear of 248 Hart Road, Thundersley (APP/M1520/W/22/3310483), which allowed a development of 44 new affordable homes alongside new open space, play space, landscaping, access and associated infrastructure.

The appeal decision was issued on 26 May 2023. In similarity with my letter regarding the Manor Trading Estate appeal (and those decisions at Little Chalfont and Warlingham), we acknowledge that the context of the Hart Road site subject of the appeal will undoubtedly be subject to differences to the circumstances for our current planning application.

However, the matter of principal importance is the weight which the inspectors have afforded to the particular material considerations in favour of those appeal schemes, in reaching a conclusion that very special circumstances exist to justify the grant of planning permission.

I would therefore wish to draw your attention to the following important conclusions of note from the Hart Road appeal decision which I consider are directly applicable to the determination of our planning application on land east of Rayleigh Road.

- First, the inspector in the Hart Road case considered the conclusions of the council's Green Belt evidence base, and the outcome that exceptional circumstances existed to justify the release of the site from the Green Belt. At paragraph 14 of their decision letter, the inspector concluded, *"Based on the Council's evidence, the need to promote sustainable patterns of development and fact that housing could not be accommodated within the existing urban area, the Examining Inspector for Council's withdrawn Local Plan indicated there were exceptional circumstances for the parcel of land within which the site is situated to be removed from the Green Belt. Accordingly, as the appeal at Billericay [the Kennel Lane, Billericay¹ appeal decision], given that the evidence informed a plan found to be sound, it is a material consideration to the determination of this appeal of significant weight."*
- As highlighted within our submitted planning statement for land east of Rayleigh Road (please see paragraphs 7.2.1 to 7.3.6), the inspector considering the now withdrawn Castle Point Local Plan 2018-2033 reached similar conclusions for our application site that exceptional circumstances existed to justify the release of the site from the Green Belt. Furthermore, it is important to emphasise that the examining inspector found the emerging local plan sound, including the release of land east of Rayleigh Road from the Green Belt.



Additionally, our submitted planning statement reaches a similar conclusion to that of the inspector in the Hart Road case regarding the weight to be afforded to the withdrawn local plan's evidence base (significant weight).

- I would briefly note the inspector's conclusions at paragraph 38 of their appeal decision, which was written in response to comments received from members of the local community regarding the availability of empty homes in the borough. The inspector was unconvinced on this point, as follows: *"While some concerns have been raised regarding the availability of empty homes, there is no substantive evidence before me to demonstrate this is a particular problem in the settlement or the Borough. Similarly, at the Hearing I was referred to the potential for other sites to be developed in preference of the appeal site, including on brownfield land, but I have not been referred to specific sites and, in any event, I must consider the proposal that is before me."*
- At paragraph 46 of the appeal decision, the inspector notes the shortfall of affordable housing since 2014, presenting extremely stark figures which are (in our view) compelling: *"The SoCG [Statement of Common Ground] also alludes to problems of delivery of affordable homes in the Borough. Moreover, the evidence before me demonstrates only 130 affordable homes were constructed between 2014 and 2022, but this does not include the 56 homes within existing stock transferred through Right to Buy over that period. The net figure of affordable homes built is therefore 74 or nine dwelling per annum, which equates to six percent of all homes built. When this is compared to the need set out above, there is a shortfall of 2564 homes over the period or 326 each year, and only three percent of needs met."*
- Continuing, at paragraph 47, the inspector concluded – *"To add to this, data from DLUHC presented in the appellants' report by Savills indicates affordable housing stock within Castle Point represents only a small proportion of the total stock (5.41 percent), which is significantly below the Essex average of 14.21 percent and 16.4 percent for England. The Council therefore has very limited existing affordable housing stock and is falling significantly short of meeting its assessed need, with its residents facing long waiting times for properties. Moreover, waiting times for 1-bed properties are 12-18 months, 18-24 months for 2-bed homes, and 30-36 months for a 3-bed house. As such, the outlook is very bleak for the significant number of households on the Housing Register, which has increased year-on-year, but is unlikely to capture all those in need of affordable housing, with the overall housing need likely being much greater. To add to this, the appellants' evidence demonstrates there are considerable affordability problems with house prices and rent levels in the Borough, which are increasing."*

As outlined at paragraphs 7.58 and 7.5.9 of our submitted planning statement, it is pertinent to note the significant under supply of affordable housing in the borough since 2011. Over the 10-year period to 2021, just 169 affordable homes were provided in the Borough, with just 18 affordable homes having been delivered since 2018 (the beginning of the withdrawn local plan period). The delivery of 40% affordable homes on the Rayleigh Road site would therefore exceed the level of affordable housing delivered in the Borough over the past 10 years and could be provided in their entirety by the 2028/29 monitoring year.

The delivery of 40% affordable housing in this context should therefore be afforded very significant weight. I note, from the inspector's conclusions in paragraphs 48 to 51 of the appeal decision their concern regarding the impact that such a low supply of affordable housing in the borough upon the lives of households on the waiting list. The inspector ultimately affords very substantial weight to the delivery of 44 affordable homes. It is therefore critical that the supply of affordable housing in the borough is boosted as soon as possible to rectify the real world consequences of a continued, persistent and detrimental under supply of both market and affordable housing in the borough.

- Finally, at paragraph 66 the inspector ultimately concludes that very special circumstances exist in favour of allowing the appeal. They concluded, *"The evidence before me demonstrates the Council has persistently failed to deliver affordable homes in the Borough and a plan-led solution to the chronic shortage of housing is some way from being in place. The proposal would therefore*



represent a significantly important opportunity to provide a considerable boost to the supply of affordable homes for local people in the short term. I have afforded very substantial weight to this consideration in favour of the appeal scheme. The appeal proposal would also provide a range of other economic, social and environmental benefits, of varying weight.”

Conclusions

The inspector in this decision makes it clear that the council’s decision to withdraw the sound local plan is having real world implications for people in need of affordable housing. I note that our planning application, by virtue of its size, would provide significantly more affordable homes than those to be provided on the Hart Road site. Indeed, the 182 affordable dwellings which would be provided on land east of Rayleigh Road, Thundersley, would exceed the totality of affordable homes delivered in Castle Point since 2011 (as highlighted in paragraphs 8.18 and 8.19 of our planning statement (including our consideration that very significant weight should apply to the provision of affordable housing on land east of Rayleigh Road, particularly in light of the local context of substantial failure to deliver sufficient new homes).

The conclusions of the Hart Road inspector are further reinforced by the conclusions of the recent Shelter report, entitled “*Homelessness in England 2022*”, which was published in January 2023 (I enclose this report with this letter). The research estimated the snapshot of the number of people who are recorded as homeless on a given night in 2022. The types of homelessness included in the research were as follows:

- People who have been accepted as homeless and now live in temporary accommodation arranged by their local council.
- People who have been accepted as homeless and now live in temporary accommodation arranged by themselves or are living ‘homeless at home’ – meaning that they are legally homeless because it is not reasonable for them to continue to live in their home, but they are yet to be moved into temporary accommodation.
- People who are sleeping on the streets.
- Single people who are homeless and living in hostel or supported accommodation, but who are not counted amongst those in the statutory homelessness figures; and
- People who are owed a duty under the Children’s Act and are living in temporary accommodation that has been arranged by Social Services

The report includes Table 5 (all local rates of people who are homeless (living in temporary accommodation or sleeping on the streets), England only), which considers the results at local authority level. Table 5 outlines that there are an estimated 272 people who are homeless in Castle Point and living in temporary accommodation arranged by the council (this includes 133 homeless children). The report therefore concludes that there is an estimated 280 people in Castle Point who are homeless, with a rate of homelessness in the borough of 1 in 320 people. These are the real-world implications which are referred to by the inspector in the Hart Road appeal, and as advanced within our submitted planning statement.

Decisions on where to provide new market and, in particular, affordable homes cannot be deferred until the adoption of the new Castle Point Plan. There is a continued need for new homes in the borough, in the context of a significant historic shortfall (both in the delivery of market and, particularly, affordable housing) and worsening affordability.

It is therefore considered that our overall planning balance, as outlined in section 9 of our submitted planning statement, is supported by the conclusions of the inspector in the Hart Road appeal decision, and therefore I continue to be of the view that our application demonstrates sufficient very special circumstances exist which outweigh the identified harms to the Green Belt. In this case, I would therefore respectfully invite you to reach a similar conclusion, and to apply (should you similarly conclude that sufficient very special circumstances



exist) the tilted balance in favour of granting planning permission, as outlined in paragraph 11d of the National Planning Policy Framework.

I trust that this letter, and its enclosed documents are of assistance, and I would be grateful if the quoted appeal decisions could be taken into consideration in the determination of our planning application. Should you have any queries regarding the above, or the enclosed, please do not hesitate to contact me.

Yours sincerely

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Enc(s): Land rear of 248 Hart Road, Thundersley (APP/M1520/W/22/3310483) appeal decision
(issued 26 May 2023)
Shelter Report – Homeless in England 2022, published January 2023

Copy to: Sophie Adams
Mark Sperrin
Mike Carpenter



Appeal Decision

Hearing held on 29 March 2023

Site visit made on 28 and 29 March 2023

by Paul Thompson DipTRP MAUD MRTPI

an Inspector appointed by the Secretary of State

Decision date: 26 May 2023

Appeal Ref: APP/M1520/W/22/3310483

Land Rear of 248 Hart Road, Thundersley, Benfleet SS7 3UQ

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Legal & General Affordable Homes against the decision of Castle Point Borough Council.
 - The application Ref 21/1137/FUL, dated 9 December 2021, was refused by notice dated 21 June 2022.
 - The development proposed is 46 dwellings with open space, playspace, landscaping, access and associated infrastructure.
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Decision

1. The appeal is allowed and planning permission is granted for Demolish existing building and stables and construct 44. affordable dwellings including open space, play space, landscaping and associated access, infrastructure and parking arrangements, at Land Rear of 248 Hart Road, Thundersley, Benfleet SS7 3UQ in accordance with the terms of the application, Ref 21/1137/FUL, dated 9 December 2021, subject to the attached schedule of conditions.

Procedural Matters

2. Despite the description of development set out above, I consider the description found on the Appeal Form better reflects the amended scheme before me and which the Council considered. The development proposed is therefore to 'Demolish existing building and stables and construct 44 affordable dwellings including open space, play space, landscaping and associated access, infrastructure and parking arrangements'.
3. Following determination of the planning application, on 22 June 2022 the Council withdrew its New Castle Point Local Plan 2018-2033. The plan had progressed through its Examination and the Inspector had reported on final modifications. Hence, in its Statement of Case the Council has confirmed it no longer seeks to defend its second reason for refusal relating to prematurity.
4. The Conservation of Habitats and Species Regulations 2017 ('the Habitats Regulations') transpose the Habitats Directive and the Birds Directive into English law. The aim of the Directives is to conserve key habitats and species across the European Union by creating and maintaining a network of sites known as the Natura 2000 network. They require competent authorities before granting consent for a plan or project, to carry out an appropriate assessment (AA) in circumstances where the plan or project is likely to have a significant effect on a European site, alone or in-combination with other plans or projects.

5. The Officer Report identifies that the Council has carried out its own assessment, but my determination of the appeal means I also must undertake the same statutory duty. I have therefore dealt with this matter as a main issue and engaged with the main parties and Natural England accordingly.
6. The appellant has submitted amended plans in support of the appeal which did not form part of the original planning application. I am conscious that the appeal process should not be used as a means to progress alternatives to a scheme that has been refused. However, the plans only seek to alter the appearance of the dwellings to correct the position of photovoltaic panels to their roofs. Having regard to fairness and natural justice, I consider that interested parties would not be prejudiced if I were to consider the proposed amendments. My findings therefore relate to the amended plans.

Main Issues

7. The Statement of Common Ground (SoCG) between the Council and appellants states the proposal is inappropriate development in the Green Belt, so it is not necessary for me to cover this point in any further detail. Therefore, based on the evidence before me, the main issues are:
 - the effect of the proposal on the openness of the Green Belt and purposes of including land within the Green Belt;
 - the effect of the proposal on the integrity of the features of European nature conservation sites at the Essex Coast;
 - other matters relevant to proposed development; and
 - whether the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. If so, would this amount to the very special circumstances required to justify the proposal.

Reasons

Openness and the Purposes of Including Land within the Green Belt

8. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics thereof are their openness and permanence. The openness of the Green Belt has a spatial aspect as well as a visual aspect. The National Planning Policy Framework (the Framework) also clarifies that the Green Belt serves five purposes, including to check the unrestricted sprawl of large built-up areas and to assist in safeguarding the countryside from encroachment.
9. The appeal site is primarily a large paddock of land to the south of Hart Road but includes No 148 and the numerous structures, areas of hardstanding and manège to its rear. Its northern boundary adjoins other properties fronting the road. To the west are the buildings and grounds of the Cedar Hall School. To the east are a cul de sac of bungalows in Greenleas and the long gardens of houses in Rayleigh Road. To the south is a further paddock, which adjoins The Chase, a residential street with housing to either side. This includes a modern development of homes north of the street, this extends as far as the school, adjacent to the southern boundary of the site.
10. The boundaries to the site are generally enclosed by mature hedgerow and tree planting, which provide verdant or sylvan surroundings to much of the site.

However, the boundaries to the northern part of the site adjoining the school and neighbouring homes are more open. The existing buildings within the site, including the dwelling, are of varied footprint, scale, and height, so have different effects on openness and would be demolished for the dwellings.

11. The proposal is supported by a Landscape and Visual Appraisal, and I accept that a scheme of landscaping for the site would be likely to be integral to the layout of the appeal scheme and reflect planting found in the immediate environment. Despite this, the proposal is for a large area incorporating a significant increase in built forms and, at least in the short- to medium-term, it would be clearly discernible to occupiers of the adjacent properties, from along the proposed route into the site and from the south over the adjacent paddock and intervening planting, particularly during winter months.
12. The houses immediately southwest and the new school building have both reduced the openness of this part of the Green Belt and reinforced its urban fringe characteristics, but the proposal would further fragment the Green Belt. Moreover, parts of the Green Belt to the east would be further isolated from those to the south and west, so it would be less effective, a point which was accepted by the appellants at the Hearing.
13. For these reasons, the proposed development would result in a harm to the Green Belt through loss of openness in both visual and spatial terms. This would contribute to urban sprawl, in conflict with the purposes of including land within the Green Belt. Again, this point is agreed by the main parties but not the extent of harm caused by that conflict.
14. The SoCG confirms agreement that the evidence base documents for the withdrawn local plan remain relevant. This includes the Castle Point Green Belt Assessment 2019, which was used to establish the importance of the site, within a much larger parcel of land, to the purposes of the Green Belt. Moreover, the harm to checking the unrestricted sprawl of large built up areas and to safeguarding the countryside from encroachment were respectively adjudged to be moderate and minor. The appellants have also produced their own site-specific Green Belt Assessment and arrived at similar conclusions.
15. Based on the Council's evidence, the need to promote sustainable patterns of development and fact that housing could not be accommodated within the existing urban area, the Examining Inspector for Council's withdrawn Local Plan indicated there were exceptional circumstances for the parcel of land within which the site is situated to be removed from the Green Belt. Accordingly, as the appeal at Billericay¹, given that the evidence informed a plan found to be sound, it is a material consideration to the determination of this appeal of significant weight.
16. The Examining Inspector identified that there would be limited harm to the Green Belt through loss of openness and to those purposes. While the proposal would not come forward through a comprehensive development, as envisaged for the parcel, due to the presence of other existing development, west at the school and houses to the southwest, the extent of the harms I have identified to the Green Belt would also be limited. Nevertheless, the proposal would be contrary to the main aims of Green Belt policy outlined in the Framework.

¹ Appeal Reference: APP/V1505/W/22/3298599 - Land North off Kennel Lane, Billericay.

European Nature Conservation Sites

17. The appeal site falls within the recreational disturbance Zone of Influence (ZOI) for several European nature conservation sites situated along the Essex coast, namely the Essex Estuaries Special Area of Conservation (SAC), the Blackwater Estuary Special Protection Area (SPA) and Ramsar sites; and the Benfleet and Southend Marshes SPA and Ramsar sites.
18. The qualifying features of the Benfleet and Southend Marshes SPA are wintering birds including: Common Ringed Plover, Dark-Bellied Brent Goose, Dunlin, Grey Plover and Red Knot. Waterbird assemblages are also important. The Ramsar site also qualifies due to these species.
19. The qualifying features of the Blackwater Estuary SPA are wintering and breeding birds including: Black-Tailed Godwit, Common Pochard, Common Ringed Plover, Dark-Bellied Brent Goose, Dunlin, Grey Plover, Hen Harrier, and Little Tern. Waterbird assemblages are also important. The Ramsar site also qualifies due to these species, but also for other flora and fauna present.
20. Moreover, the qualifying features of the Essex Estuaries SAC relate to the extensive habitats found across the European Sites that overlap it, including Blackwater Estuary, which feature, amongst others, sandbanks and mudflats and the flora that thrive there.
21. The European Site Objectives for the SPAs and SAC overlap and are to ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, or its Favourable Conservation Status, by maintaining or restoring the extent, distribution, structure and function of the habitats of the qualifying features; the supporting processes on which these rely; population of each of the qualifying features; and their distribution within the site.
22. All residential proposals contained within the ZOI for these sites covered by the Essex Coast Recreational Disturbance Avoidance & Mitigation Strategy (RAMS) are required to have regard to the potential adverse effects from increased recreational disturbance.
23. In combination with further new housing expected to come forward in the ZOIs, the increased recreational pressure from the proposed development of 44 dwellings, would contribute to the disturbance of these habitats, including the key bird species, contrary to the relevant conservation objectives of the European Sites. In the absence of mitigation, the proposal therefore has the potential to result in likely significant effects on the European Sites and an AA is required.
24. RAMS sets out the strategy to mitigate the potential in-combination impacts of new housing development on European Sites. It includes a tariff that should be applied to new housing developments within the ZOI. The tariff was agreed based on housing projections from the participating authorities that would require mitigation up to 2038. The contributions made through the tariff are to fund education and communication and habitat-based measures, including habitat creation and enforcement and monitoring.
25. As the competent authority I have consulted Natural England (NE) as the appropriate nature conservation body. NE is satisfied that the avoidance and mitigation measures in RAMS are appropriate to avoid an adverse effect from

the proposal to the integrity of the European Sites and qualifying features. With the above in mind, I am also satisfied that there would be sufficient procedures in place to secure appropriate mitigation and ensure that it would be provided in a timely manner to accord with RAMS.

26. While the RAMS figure referred to in the Section 106 Legal Agreement (S106) does not match that referred to in NE's consultation response, it includes provision for the tariff to reflect the current amount prior to payment.
27. I therefore conclude that the proposed development, either alone or in combination with other plans or projects, would not adversely affect the integrity of the European Sites protected under the Habitats Regulations. Hence, it would accord with the habitats and species protection criteria set out in Policy EC13 of the Castle Point Borough Council Local Plan (Adopted 17 November 1998) and the Framework.

Other Matters Relevant to the Proposed Development

Access, Highway Safety, Traffic Congestion and Air Quality

28. Concerns are raised by interested parties regarding the suitability of Hart Road and the junctions further east to serve the proposal, including at times school drop-offs and pick-ups take place. The evidence before me demonstrates that the proposal, including any construction traffic, would be unlikely to result in highway safety or capacity issues to the surrounding road network and users, including in proximity of the adjacent school.
29. The appeal is supported by a Transport Statement and Road Safety Audit and the former was undertaken for a higher number of dwellings. The magnitude of vehicle trips likely to be associated with the proposal would be limited so is unlikely to result in a severe cumulative impact on the road network relating to highway safety or its operational performance and levels of congestion. I also note that school times are busy all over the country and it is not the appellants' responsibility to address existing issues associated with school pick-up or drop-offs, including the improvement of nearby junctions to enhance their performance. I also note that Essex County Council, as Local Highway Authority did not raise concerns, subject to planning conditions. Furthermore, the evidence before me indicates regular bus services are available and the site is situated within walking distance of shops, services, and facilities.
30. In addition, the appellants' Construction Environmental Management Plan, for highway impacts, commits to addressing any damage or defects associated with vehicle routes to and from the site to the A127, which would be controlled by a condition requiring compliance with the measures outlined therein.
31. I have not been referred to the site being within a declared Air Quality Management Area and there is no substantive evidence before me of an existing problem with air quality in the area or that traffic associated with the proposal would lead to harm to nearby residents in this respect. Furthermore, the Construction Environmental Management Plans would control emissions and dust from the site during the construction phase.

Appearance and Loss of Open Space

32. While there would inevitably be a change to the appearance of the site when viewed from neighbouring properties and within its surroundings, the proposal

would be of a layout and appearance that would be complimentary to the grain of development found within the locality. Similarly, the appeal site is private land, not accessible to the public, so its development would not result in the loss of public open space.

Flood Risk, Water Supply, Firefighting, Climate Change and Habitat

33. The proposal would add to hard surfacing within the site but there are sufficient details before me to be confident that the drainage scheme could be finalised by condition to ensure it would not lead to flooding elsewhere. Development of the site would therefore not adversely affect the potential of the land to mitigate against rainfall in the immediate vicinity. Furthermore, there is no firm evidence before me to demonstrate any drainage features would be likely to result in stagnant water that would, in turn, lead to problems with pests.
34. Despite concerns advanced regarding the mains water pipes in the locality, there is no substantive evidence before me from Anglian Water that would lead me to doubt that water supply could be facilitated to service the proposal. Similarly, the availability of water for firefighting purposes and the inclusion of sprinklers would need to be addressed through Building Regulations, as I have not been referred to relevant policies that specifically address such matters.
35. At the Hearing, I was referred to the implications of the site adding to an urban heat island effect, but there is no substantive evidence before me as to the precise effect that would result from the proposal. There is greater certainty that the proposal would deliver housing to a high standard that would be energy efficient, alongside biodiversity benefits.
36. The site is identified as part of the Thundersley Plotlands Local Wildlife Site (LWS) and there are concerns from interested parties that development of the site would result in loss of its ecological value. However, the evidence before me indicates the land is of low intrinsic and conservation importance and any protected species identified in the appellants' *Ecological Impact Assessment* utilising the site for foraging or commuting purposes would be able to continue to do so, including badgers and hedgehogs, subject to mitigation measures controlled planning conditions. Furthermore, the proposal would improve habitat and hedgerows within the site which would compensate for the loss of this part of the LWS. I note that the Council's officers did not raise any concerns in respect of such matters and there is no substantive evidence before me that would justify me arriving at a different conclusion.

Living Conditions

37. Due to the layout of the proposal and the intervening distances achieved, there would be unlikely to be harm caused to the living conditions of the occupants of neighbouring properties, particularly in terms of privacy, outlook, and daylight. The position of external public lighting would also be agreed by planning condition to reduce potential for disturbance to residents.

Need for the Development

38. While some concerns have been raised regarding the availability of empty homes, there is no substantive evidence before me to demonstrate this is a particular problem in the settlement or the Borough. Similarly, at the Hearing I was referred to the potential for other sites to be developed in preference of

the appeal site, including on brownfield land, but I have not been referred to specific sites and, in any event, I must consider the proposal that is before me.

39. Notwithstanding this, at the Hearing, interested parties identified that homes need to be in the right locations for people that need them, including young people with lower wages, and that house prices influence the availability of homes to local people, with greater competition given the proximity to London. The proposal would assist in the provision of homes for precisely those people.

Infrastructure Provision

40. Concerns have been raised that local infrastructure, including health services, would be unable to cope with additional development. However, there is no compelling argument that the proposed development would directly affect the capacity of local infrastructure and I note that the availability of infrastructure is a challenge nationally. Resisting the development on the grounds of the capacity of local infrastructure would not therefore be justified, particularly as contributions would be made to infrastructure in connection with the proposal.

Other Developments and Future Development Adjacent

41. Interested parties have referred to other developments of housing that have been permitted in Benfleet and Thundersley, some of which would be in the Green Belt. While this suggests that there has been continuous development and expansion within these settlements, there are no details before me as to how they would compare with the developments before me. In any event, based on my findings in this and the other main issues, there would be no harms associated with the proposal, except those that I have identified to the Green Belt. These can only be outweighed by very special circumstances relevant to the appeal before me. For these reasons, it would be unreasonable for me to seek to draw comparisons with any other scheme nearby either in favour or against the appeal scheme.
42. The appellants have committed through the S106 to ensure that routes to the south and east would not be used for vehicular links to future development, but I am mindful that future applications and appeals for such proposals would need to be considered on their own merits.
43. For the reasons outlined above, these other matters would not justify withholding permission for the proposed development.

Other Considerations (Green Belt)

Affordable Housing and Delivery

44. The appeal scheme would be wholly for affordable housing with a tenure split of nine homes for Affordable Rent and 35 for Shared Ownership. The provision of these homes and their governance by the Registered Provider would be secured through the S106.
45. The SoCG outlines that the Council is only able demonstrate no more than a 1.86-year housing land supply based on a housing need of 355 per annum for the period 2022-2027. It goes on to state the *South Essex Housing Market Assessment Addendum* (2017) formed part of the evidence base of the withdrawn local plan and calculated a net annual affordable housing need for

the Borough of 353 affordable homes per annum over the period 2014-2019 and then 291 per annum to 2036/7.

46. The SoCG also alludes to problems of delivery of affordable homes in the Borough. Moreover, the evidence before me demonstrates only 130 affordable homes were constructed between 2014 and 2022, but this does not include the 56 homes within existing stock transferred through Right to Buy over that period. The net figure of affordable homes built is therefore 74 or nine dwelling per annum, which equates to six percent of all homes built. When this is compared to the need set out above, there is a shortfall of 2564 homes over the period or 326 each year, and only three percent of needs met.
47. To add to this, data from DLUHC² presented in the appellants' report by Savills³ indicates affordable housing stock within Castle Point represents only a small proportion of the total stock (5.41 percent), which is significantly below the Essex average of 14.21 percent and 16.4 percent for England. The Council therefore has very limited existing affordable housing stock and is falling significantly short of meeting its assessed need, with its residents facing long waiting times for properties⁴. Moreover, waiting times for 1-bed properties are 12-18 months, 18-24 months for 2-bed homes, and 30-36 months for a 3-bed house. As such, the outlook is very bleak for the significant number of households on the Housing Register⁵, which has increased year-on-year, but is unlikely to capture all those in need of affordable housing, with the overall housing need likely being much greater. To add to this, the appellants' evidence demonstrates there are considerable affordability problems with house prices and rent levels in the Borough, which are increasing.
48. It is impossible to ignore the reality that the under delivery of homes and the consequences of increasing house prices and decreasing affordability will be certain to have a significantly harmful impact on the lives of those households affected. The persistent under delivery of affordable housing in Castle Point and the unmet need for these homes therefore represent acute problems.
49. At the Hearing, the Council accepted there is a severe need for affordable housing, it is not meeting and has historically not met this need, and has to produce more homes. However, there is no substantive evidence before me that there is likely to be a marked improvement in the delivery of affordable homes or a plan-led solution in the short- to medium-term. Moreover, the Council withdrew a sound local and its indicative timetable for the production of a new Local Plan would result in adoption, at best, in March 2026.
50. Affordable housing is a scarce resource in Castle Point and the proposal would deliver more such homes than have been provided across the Borough in the last five years. This represents a significant provision, which would help to meet identified need for shared ownership homes in the Borough, specifically Thundersley⁶, and target identified needs for two- and three-bedroom homes, while securing a greater mix of tenures within the Borough.
51. Accordingly, for these reasons, I afford very substantial weight to the delivery of 44 affordable homes in this location.

² Department for Levelling Up, Housing and Communities – Live Table 100.

³ Affordable Housing Analysis, November 2022.

⁴ Based on Affordable Housing Data provided to the appellants by the Council, as of 31 March 2022.

⁵ 598, as of 31 March 2022.

⁶ Help to Buy South, 4 December 2022.

52. I have been referred to the appeal decision at Rayleigh Road, Thundersley⁷ but I am not aware of the evidence base that was before the Inspector for that appeal in relation to the need for affordable housing. In any event, the appeal before me differs in that the housing would be secured by S106.

Other Benefits Secured by the Legal Agreement

53. I have already referred to the payment required for RAMS above, which would be necessary to mitigate against the impact of the proposed development on European Sites. Similarly, the S106 also includes a schedule to secure a Residential Travel Information Pack including travel vouchers to encourage sustainable travel, which would be provided for occupants of all the dwellings. These obligations would therefore neither weigh for nor against the proposal.

54. The S106 includes provisions for access to a Public Access Path south for pedestrians, cyclists, and wheelchair users and similar provisions for pedestrian and cycle connections to the east. The S106 also makes provision for a management company for the open spaces and play space within the site to provide long term security.

55. As these obligations can only mitigate against the proposal, I afford them limited weight as benefits associated with it.

56. I am satisfied that these provisions outlined in the S106, and those relating to affordable housing, are supported by the Council's Developer Contributions Guidance SPD (2008). They also meet all the tests set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 (CIL Regulations) and Framework paragraph 57. Moreover, they are directly related to the development because they would provide infrastructure through it and address European Sites impacted by additional development. The contributions are also reasonable in scale and kind, as they are informed by the latest evidence regarding what would be required to provide mitigation.

CIL Charging and the Legal Agreement

57. The Council's CIL Charging Schedule has been agreed, published and was effective as of 1 May 2023. Paragraph 12 of the *Castle Point Borough Council CIL Draft Charging Schedule, Examiner's Report, February 2023* (CIL) states the revised infrastructure schedule for the Borough. The contributions to healthcare, indoor sports facilities, libraries, and to deliver a MUGA set out in the S106 have been identified to be funded by CIL. These obligations would therefore fail to be necessary through the S106 and cease to be payable through its obligations.

58. The S106 also includes a financial contribution to primary education but the Examiners Report is categorical that CIL now excludes contributions to primary and secondary education facilities, because Essex County Council, as Local Education Authority, consider there is no demonstrable need for additional school places in the Borough relevant to the level of housing growth expected. At the Hearing, the Council was not able to provide any substantive evidence as to the reasons why the obligation should remain, so it too would cease to be payable through the obligation.

⁷ Appeal Reference: APP/M1520/W/19/3240145 - Land Rear of 301 Rayleigh Road, Thundersley.

59. For these reasons, these obligations would not meet the statutory tests as set out in Regulation 122 of the CIL Regulations. This does not affect the remaining obligations within the S106 agreement detailed above.

Additional Benefits

60. Future occupants would be likely to support local shops, services, and facilities through expenditure, which would constitute moderate benefits in social and economic terms, given the magnitude of the proposal.
61. The appellant's evidence on the labour market profile indicates that 9.5% of the local workforce is employed in construction industries, but there is no formal mechanism to ensure this would commute to the proposal either through employment or skills provision. However, it is likely there would be some contribution to such employment locally, so I afford this economic benefit a limited amount of weight.
62. I am mindful that biodiversity net gain is not yet a mandatory requirement of development, but the Framework is supportive of measurable attempts to secure such benefits. The benefits that could be secured by the proposal would not materialise without development and there would be a net gain through habitat and hedges and I afford this environmental benefit moderate weight given the nature and extent of the benefits outlined in the appellants' *Biodiversity Management Plan*.
63. All the dwellings would be of modular construction to minimise waste and to enable conversion for wheelchair use. The proposed homes would be built to a Net Zero Carbon Strategy, with forty achieving net zero carbon emissions and the remainder achieving an Energy Performance Certificate of 'A'. While such benefits may become mandatory in the future, there is no firm timescale for this. Accordingly, in advance of such legislation being enacted, and given the magnitude of the development, together these would amount to significant environmental and social benefits.

Whether Very Special Circumstances Exist

64. The appeal scheme is inappropriate development in the Green Belt. This is harmful by definition. The proposed development would reduce the Green Belt's openness and its effectiveness at checking the unrestricted sprawl of large built up areas and safeguarding the countryside from encroachment. This gives rise to additional harm, albeit I consider these to be limited. Be that as it may, these harms render the appeal scheme contrary to the Framework's aims in respect of the Green Belt. Moreover, Framework Paragraph 148 advises that substantial weight should be given to any harm to the Green Belt and that 'very special circumstances' will not exist unless these harms are 'clearly outweighed by other considerations.'
65. In terms of the other matters raised by interested parties, these are of neutral consequence to my assessment.
66. The evidence before me demonstrates the Council has persistently failed to deliver affordable homes in the Borough and a plan-led solution to the chronic shortage of housing is some way from being in place. The proposal would therefore represent a significantly important opportunity to provide a considerable boost to the supply of affordable homes for local people in the short term. I have afforded very substantial weight to this consideration in

favour of the appeal scheme. The appeal proposal would also provide a range of other economic, social and environmental benefits, of varying weight.

67. Considered together, I find that the other considerations in this case clearly outweigh the harm that I have identified. Accordingly, looking at the specific circumstances of this case I consider that very special circumstances exist which justify allowing the appeal.
68. I have considered the Council's argument that the grant of planning permission would set a precedent for other similar developments within the same parcel of the Green Belt. However, the circumstances of each application and appeal must be determined individually on their own merits, particularly in respect of very special circumstances. A generalised concern of this nature does not therefore justify withholding permission in this case.

Planning Balance

69. I outlined above that the evidence before me demonstrates the Council is likely to only be able to demonstrate 1.86 years supply of deliverable housing sites. In such circumstances, the policies which are most important for determining the appeal would ordinarily be out-of-date, but the proposal does not conflict with the saved policies of the Council's Local Plan, when taken as a whole. Nevertheless, the Framework states permission should be granted, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against policies in the Framework taken as a whole.
70. I have found that very special circumstances exist which justify allowing permission for this development in the Green Belt, so policies outlined in the Framework in respect of the Green Belt do not therefore provide a clear reason for refusing the development. There are also no other policies within the Framework that indicate permission should be withheld. Moreover, the adverse impacts of granting permission would not significantly and demonstrably outweigh the stated benefits, when assessed against the policies in the Framework taken as a whole. As such, the proposal would benefit from the presumption in favour of sustainable development, and amount to sustainable development. This would therefore justify the grant of planning permission.
71. I have had due regard to the Public Sector Equality Duty (PSED) contained in section 149 of the Equality Act 2010, which sets out the need to eliminate unlawful discrimination, harassment, and victimisation, and to advance equality of opportunity and foster good relations between people who share a protected characteristic and people who do not share it. Representations were made to the effect that the proposal could affect an adjoining occupier, as it would replace open land that provides outlook beyond a private rear garden space, which assists with the occupier's disability. The occupier is therefore a person who shares a protected characteristic for the purposes of the PSED. I have also had regard to rights conveyed within the Human Rights Act.
72. I have found that the proposed development would not result in harm to the outlook from neighbouring properties, so the occupier would not suffer unacceptable harm to their living conditions. I am therefore satisfied a grant of planning permission would not unacceptably interfere with the occupiers right to a private and family life and home or discriminate against a person with a protected characteristic of disability. Therefore, whilst I acknowledge the occupiers' personal circumstances, I conclude that these are not matters which

outweigh the benefits of the proposal in respect of my aforementioned conclusions on the proposed development referred to above. It is proportionate in the circumstances to allow the appeal.

Conditions

73. I have considered the list of conditions provided by the main parties and, where appropriate, amended the wording for clarity and removed tailpieces to conditions that circumvent the statutory route to vary conditions or deprive interested parties of the opportunity to comment.
74. I have imposed standard conditions relating to the commencement of development and compliance with the submitted plans, in the interests of achieving a satisfactory development.
75. Pre-commencement conditions are necessary to ensure works to remove invasive species are carried out, in the interests of the biodiversity of the site; that a Site Waste Management Plan is secured to control site waste and efficient use of resources; and that construction details of access roads suitable for refuse collection services are provided.
76. Conditions following demolition works are also necessary for a programme of archaeological work, to ensure the preservation of deposits; a detailed surface water drainage scheme and a scheme for its maintenance, to prevent flooding and other environmental harm from the developed site; and a similar scheme to minimise surface and ground water flooding during the construction phase.
77. It is also necessary for conditions to ensure the scheme accords with the benefits outlined above. Accordingly, details are required to be provided prior to occupation of the dwellings for independent verification of the strategy for energy efficiency to ensure the dwellings meet the identified standards; and the proposed dwellings shall meet the requirements of Part M4(2) of the Building Regulations for the needs of current and future users.
78. Furthermore, prior to occupation, the provision of visibility splays to Hart Road and from driveways within the scheme, are necessary in the interest of highway safety; and a scheme of external public lighting in the interests of living conditions of residents and the ecological sensitivity of the landscaped areas and adjoining land.
79. In the interests of maintaining the nature conservation value of the site, details of boundary features are required to ensure they would facilitate the movement of wildlife across the site, particularly for badgers and hedgehogs. Similarly, the details of security fences should be agreed for this reason and to provide relief for occupiers of nearby properties from the fences.
80. A condition is also necessary to ensure compliance with the two Construction Environmental Method Statements in the interests of the living conditions of nearby residents and ecology and biodiversity of the site and its surroundings.
81. Conditions are also necessary to ensure compliance with the measures to protect trees and other planting outlined in the Arboricultural Impact Assessment and Tree Protection Plan; the Specification for Soft Landscape Works and 10 year Management Plan; the biodiversity management of open spaces to secure ecological management of the site in perpetuity; the provision of appropriate obscure glazed glass where it is to be fitted, for reasons of

privacy; avoidance of unbound material of parts of driveways adjacent to the highway; and the provision of parking within each plot and for visitors.

82. Further conditions are reasonable to ensure the timely delivery of play and open spaces and their retention, the agreement of materials above slab level, and a scheme detailing how the dwellings would achieve recommended internal noise levels.

Conclusion

83. The proposal would accord with the relevant saved policies of the development plan and there are no policies within the Framework that indicate that permission should be withheld. Accordingly, for the reasons given, I conclude that the appeal should be allowed.

Paul Thompson

INSPECTOR

APPEARANCES

FOR THE APPELLANTS

Mary Cook	Barrister (Town Legal LLP)
Sam Hollingworth	Planning Consultant (Savills)
Errin Marshall	Graduate Planning Consultant (Savills)
Annette Simpson	Director of Development and Partnerships (Legal and General Affordable Homes)
Vanessa Ross	Landscape Architect (Arc Landscape Design and Planning Ltd)
James Stacey	Affordable Housing Specialist (Tetlow King Planning)

FOR THE LOCAL PLANNING AUTHORITY:

Alison Hutchinson	Planning Consultant
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OTHER INTERESTED PARTIES

Avril Betts-Brown

Gillian Boutall

Mrs Bradley

Stephen Bristow

Mrs Burrell

Joan Clayton

William Clayton

Tim Copsey

Gavin Culff

Coral Elsegood

Tom Gibson

District Councillor for the Cedar Hall Ward

David Goodman

Janet Kendrick

Nicola McGee

Liz Palmer

Ray Perryman

Maurine Skeels

Richard Weldon

SCHEDULE OF CONDITIONS

1. The development hereby permitted shall be begun on or before the expiration of three years beginning with the date of this permission.
2. The development hereby permitted shall be carried out in accordance with the following approved plans: 519/19/FUL/PL10.00 Rev B, 519/19/FUL/PL10.01 Rev B, 519/19/FUL/PL20.00 Rev, 519/19/FUL/PL20.01 Rev B, 519/19/FUL/PL20.02 Rev B, 519/19/FUL/PL30.00, 519/19/FUL/PL30.01, 519/19/FUL/PL30.02, 519/19/FUL/PL40.00 Rev B, 519/19/FUL/PL40.01 Rev B, 519/19/FUL/PL40.02 Rev B, 519/19/FUL/PL50.00 Rev B, 519/19/FUL/PL50.01 Rev B, 519/19/FUL/PL60.00 Rev B, 519/19/FUL/PL60.01 Rev B, 519/19/FUL/PL500.00, 519/19/FUL/PL1000, 519/19/FUL/PL1003 Rev A, 519/19/FUL/PL1004 Rev B, 519/19/FUL/PL1005 Rev A, 519/19/FUL/PL1006 Rev A, 519/19/FUL/PL1007 Rev A, 519/19/FUL/PL2001 Rev B, OS 2244-21.2 Rev B, OS 2244-21.3 Rev B, OS 2244-21.4 Rev A, 21328-HYD-XX-XX-DR-C-2600 P02, 21328-HYD-XX-XX-DR-C-2600 P04 and 21328-HYD-XX-XX-DR-C-2600 P05.
3. No works except demolition shall be begun until the applicant has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation, including a timetable for the investigation, which has been submitted to and approved in writing by the local planning authority prior to excavation of the site. Any works identified shall be undertaken in accordance with the approved details.
4. No works except demolition shall take place until a detailed surface water drainage scheme for the site, including for the construction stage, based on the sustainable drainage principles and assessment of the hydrological and hydro geological context of the development as set out in the submitted

Flood Risk Assessment dated 5 November 2021 (Doc Ref 21328-HYD-XX-XX-RP-FR-0001), has been submitted to and approved in writing by the local planning authority. The scheme should include but not be limited to:

- Verification of the suitability of infiltration of surface water for the development. This should be based on infiltration tests that have been undertaken in accordance with BRE 365 testing procedure and the infiltration testing methods found in chapter 25.3 of The CIRIA SuDS Manual C753.
- Limiting discharge rates to 2.9l/s for all storm events up to and including the 1 in 100 year plus 40% allowance for climate change storm event.
- Provide sufficient storage to ensure no off-site flooding as a result of the development during all storm events up to and including the 1 in 100 year plus 40% climate change event.
- Demonstrate that all storage features can half empty within 24 hours for the 1 in 30 plus 40% climate change critical storm event.
- Final modelling and calculations for all areas of the drainage system.
- The appropriate level of treatment for all runoff leaving the site, in line with the Simple Index Approach in chapter 26 of the CIRIA SuDS Manual C753.
- Detailed engineering drawings of each component of the drainage scheme.
- A final drainage plan which details exceedance and conveyance routes, FFL and ground levels, and location and sizing of any drainage features.
- A written report summarising the final strategy and highlighting any minor changes to the approved strategy.
- Timetable for implementation.

The approved scheme shall be implemented prior to the occupation of any dwelling and maintained as such.

5. Prior to the occupation of the dwellings hereby permitted, a management and maintenance plan for the detailed surface water drainage scheme for the site for the lifetime of the development, which shall also include any arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime, and also for maintaining of yearly logs of maintenance, shall be submitted and approved in writing by the local planning authority. The yearly logs of maintenance shall be made available for inspection upon a request by the Local Planning Authority.
6. No works except demolition shall take place until a scheme to minimise the risk of offsite flooding caused by surface water run-off and groundwater during construction works and prevent pollution has been submitted to, and approved in writing by, the local planning authority. The scheme shall subsequently be implemented as approved.
7. Prior to the commencement of development, works identified within the submitted Invasive Species Management Plan dated 9th October 2020 (3545) shall be commenced to ensure the appropriate control and eradication of Himalayan Balsam and False Virginia Creeper on the site.

Notification of completion of such works shall be submitted to the local planning authority within two years of their commencement.

8. Prior to the commencement of development, a Site Waste Management Plan (SWMP) detailing strategic forecasts in respect of expected waste arisings from demolition operations undertaken on site and the measures to be used to ensure that all waste arisings are appropriately reduced/recycled or diverted and legally disposed of, shall be submitted to and approved in writing by the local planning authority. The approved SWMP shall be adhered to throughout the construction period.
9. Details of the construction of the access roads within the site shall be submitted to and agreed by the local planning authority in writing prior to commencement of their construction to demonstrate that they are able to accommodate the weight and turning manoeuvres of a 32 tonne refuse vehicle. The roads shall be constructed in accordance with the approved details prior to the occupation of any dwelling that they serve.
10. Prior to occupation of the dwellings hereby permitted, a report from an independent certified Standard Assessment Procedure (SAP) Assessor shall be submitted to and approved in writing by the local planning authority. The report shall confirm that 40 of the dwellings hereby approved achieve, as a minimum, net zero regulated carbon; and 4 of the dwellings hereby permitted achieve, as a minimum, an Energy Performance Certificate (EPC) rating of A.
11. Prior to the above slab level construction of any dwelling, details or samples of all materials to be used on the external surfaces of the proposed development shall be submitted to and approved in writing by the local planning authority. The development shall be constructed in accordance with the approved details.
12. The proposed dwellings shall, as a minimum, meet the requirements of Part M4(2) of the Building Regulations 2010.
13. Development of the site shall be undertaken in accordance with the provisions of the submitted Construction and Environmental Management Plan (Biodiversity) Reference: OS 2244-21 Doc 5 Rev A dated December 2021 and the Construction Environment Management Plan (Construction) Reference: 21255-002 dated December 2021.
14. No works shall commence on site until the measures to protect those trees and hedgerows identified to be retained as set out in the submitted Arboricultural Impact Assessment (Reference: OS 2244-21 Doc 2 Rev A dated November 2021) and Tree Protection Plan (Drawing no OS 2244-21-2 Rev B) have been implemented. The protection measures shall be retained in situ for the duration of the construction of the development.
15. Prior to occupation of the dwellings hereby permitted, the access point at Hart Road shall provide a site access road at a minimum of 5.5m in width with 2m wide footways on either side as shown on AMA Drawing AMA/21255/SK001. The vehicular access shall be constructed at right angles to the highway boundary and to the existing carriageway with an appropriate dropped kerb vehicular crossing of the footway with clear to ground visibility splay. Such vehicular visibility splays of 2.4m x 43m in both directions, shall

be provided before the road junction is first used by vehicular traffic and retained free of any obstruction at all times thereafter.

16. Prior to occupation of the 44th dwelling, all tree planting and landscaping works shall be carried out in accordance with the provisions of the Specification for Soft Landscape Works and 10 year Management Plan (Reference OS 2244-21 Doc 4 dated December 2021).
17. No occupation of any more than 33 dwellings shall take place until the Play Space and area of publicly accessible open space located on the southern part of the site as shown on the Soft Landscape Plan OS 2244-21.3 Rev B has been implemented. The Play Space and publicly accessible open space shall thereafter be retained as such.
18. Prior to first occupation of each dwelling, within the confines of each plot, the driveway to that dwelling shall be provided with a 1.5m x 1.5m visibility splay above a height of 600mm to at least 1.8m at the junction with of any vehicular access and the highway which shall be maintained free of obstruction in perpetuity thereafter.
19. Prior to occupation of each dwelling, the parking spaces for that dwelling shown on Plan reference 519/19/FUL/PL1004 Rev B shall be laid out and made available for use. Such parking spaces shall be retained solely for that use and for no other purpose.
20. Prior to occupation of the dwellings hereby permitted, details of any external public lighting of the proposed development shall be submitted to and approved in writing by the local planning authority. The fixed external lighting shall be installed in accordance with the approved scheme prior to final occupation of any of the approved dwellings and maintained thereafter. Only the approved public external fixed lighting shall be installed.
21. The visitor vehicle parking areas indicated on plan reference 519/19/FUL/PL1005 Rev A shall be hard surfaced, sealed and marked out in parking bays prior to the occupation of the dwelling nearest to the spaces. The vehicle parking areas and associated turning areas shall be retained in this form at all times. The vehicle parking shall not be used for any purpose other than the parking of vehicles that are related to the use of the development.
22. Any tree, shrub or herbaceous plant contained within the approved landscaping scheme identified within document OS 2244-21-Doc 4 and drawing number OS2244-21.3 Rev B dated 03/12/2021, dying or being damaged, removed or becoming seriously diseased within 10 years of the date of this permission shall be replaced by a tree of a similar size and species by the applicant or the applicant's successor in title, as formally approved by the local planning authority.
23. Prior to the erection of any security fencing around the site, details of such fencing must be submitted to and approved in writing by the local planning authority. Such details of fencing must include specifications of appropriate gates as well as location and number to allow for the passage of wildlife such as badgers and hedgehogs. Such fencing shall then be implemented and retained as approved.

24. Notwithstanding OS 2244-21.4 Rev A Hard Landscaping Plan, prior to the erection of any garden fences or walls provided to demarcate the extent of private amenity areas or any means of enclosure provided to the open land on the boundaries of the site, details shall be submitted to and approved in writing by the local planning authority. Such details shall include: the means by which hedgehog highways shall be provided within and through the site and how free access is to be achieved to and from the adjacent open land by badgers. The approved details shall be implemented prior to first occupation of any dwelling to which it relates and shall be completed prior to final occupation of the development. The approved measures shall thereafter be permanently retained as such.
25. Ecological management of the open spaces shall be undertaken in accordance with the provisions of the submitted Biodiversity Management Plan (Reference: OS 2244-21-Document 3 December 2021). This shall be reviewed on a ten yearly basis and any alterations to the management regime shall be submitted to and approved by the local planning authority.
26. The windows shown in a side elevation at first floor level to be obscure glazed on the approved plans shall be glazed to at least level 3 on the Pilkington scale. Such windows shall be installed and glazed prior to the first occupation of the building and shall thereafter be permanently retained as such.
27. Prior to the any above slab level construction of any dwelling, a scheme detailing how the dwellings hereby approved will achieve recommended internal noise levels in accordance with BS 8233:2014 shall be submitted to and approved in writing by the local planning authority. The dwellings shall thereafter be constructed in accordance with the approved scheme.
28. No unbound material shall be used in the surface treatment of a vehicular access within 6 metres of the highway boundary.

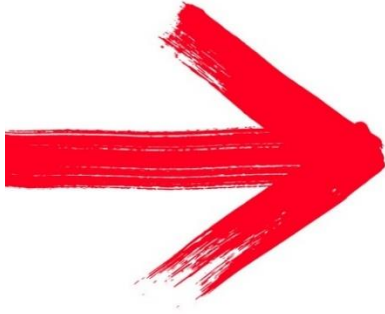
END OF SCHEDULE

January 2023



HOMELESSNESS IN ENGLAND 2022

The numbers behind the story



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Introduction

This research report provides the numbers behind Shelter’s January 2023 media story on the total number of people who are recorded as homeless in England.

Homelessness comes in many varied forms and is extremely difficult to accurately measure. This research estimates a snapshot of the number of people who are recorded as homeless on a given night in 2022. The types of homelessness that we count in this work are:

- People who have been accepted as homeless and now live in temporary accommodation arranged by their local council
- People who have been accepted as homeless and now live in temporary accommodation arranged by themselves or are living ‘homeless at home’ – meaning that they are legally homeless because it is not reasonable for them to continue to live in their home, but they are yet to be moved into temporary accommodation
- People who are sleeping on the streets
- Single people who are homeless and living in hostel or supported accommodation, but who are not counted amongst those in the statutory homelessness figures above
- People who are owed a duty under the Children’s Act and are living in temporary accommodation that has been arranged by Social Services

The first three, which are based on official statistics published by DLUHC, are used for all the levels of analysis in this report – national (England), regional and local. The latter two are based on FOIs and a voluntary sector source (Homeless Link) and have been estimated using assumptions that are detailed in the methodology section. This means they have a wider margin of error and is why they are not shown at regional or local levels.

Homelessness laws, eligibility criteria and conventions on counting and recording differ between England, Scotland and Wales, and this report focuses just on England. We do not attempt to include the various forms of hidden or unofficial homelessness, such as sofa-surfing, or overcrowded households, and stick to what could be termed as ‘recorded homelessness’. Wider definitions of homelessness would result in far more people being counted.

Methodology

The table below sets out how each element of the total is calculated, with the numbers relating to the reference number for each element used in the tables. Links to the sources used are below.

[1]	Estimated number of people homeless and living in TA arranged by the council as at 30th June 2022 <p>This is an estimate of the number of people (adults plus children) who live in households which have been found to be homeless and are living in local authority arranged temporary accommodation under homelessness legislation. It is calculated using the detailed household type information in table TA2 of the Temporary Accommodation tables, from DLUHC's official statutory homelessness statistics.¹ 'Other' household types are assumed to contain an average of two people. Q2 2022 data is used wherever possible, if it is not available, the most recent available quarter in 2021/22 is used. If no data was published in the whole year, the area is excluded.</p>
[2]	Estimated number of people homeless and living in TA arranged by them or homeless at home as at 30th June 2022 <p>This is an estimate of the number of people (adults plus children) who live in households who have been found to be homeless and are living in temporary accommodation arranged by themselves or 'homeless at home', meaning that they are legally homeless because it is not reasonable for them to continue to occupy their home but they have not yet been accommodated by the local authority. This data is found in the final columns of the TA1 tables in the same part of the official statistics above. Data is only published for the number of households and families with children, there is no breakdown of household type. We therefore assign the average regional household size of a household in council arranged temporary accommodation to the household figure. There are numerous wide variations in these figures which can appear anomalous, however these are figures submitted by councils to DLUHC, and are accurate to the best of our knowledge. The link to this dataset can be found below. Q2 2022 data is used wherever possible, if it is not available, the most recent available quarter in 2021/22 is used. If no data was published in the whole year, the area is excluded.</p>
[3]	Street homelessness <p>This is also taken from DLUHC's homelessness statistics and is from the annual count of rough sleepers, as at Autumn 2021 (most recent available).² These figures are widely considered to be an underestimate of the true scale of street homelessness. For example, many people may be missed by street counts and estimates, sleeping in concealed locations or trying to avoid bedding down at</p>

¹ DLUHC, [Statutory homelessness statistics](#), Detailed local authority level tables, Table TA2.

² DLUHC, [Rough sleeping snapshot in England: autumn 2021](#), Table 1

	night at all, instead riding public transport or walking the streets to feel safer. Values have been suppressed by DLUHC for 130 local authorities to prevent disclosure of sensitive information.
[4]	<p>Single homeless people living in hostels and supported accommodation</p> <p>The estimated number of single homeless people living in a hostel or supported accommodation on any given night is calculated using hostel or supported accommodation bed space data from the 2021 annual Homeless Link report.³ The data is reported by region and 10% is removed to account for voids. We then remove the estimated number of single person households recorded as accommodated in hostels, local authorities or housing association properties, private sector accommodation leased by a council or run by a registered provider and other TA including supported lodgings in the statutory temporary accommodation figures (all categories in which beds reported in the Homeless Link figures could fall). This is calculated by removing households with children and applying the average proportion of single person households out of all households without children to the remaining figure. These measures minimise the risk of double counting and are conservative estimates. This is shown at national level only as the adjusted regional figure are not individually reliable enough to report on.</p>
[5]	<p>Social services accommodation</p> <p>The number of people (adults and children) living in temporary accommodation arranged by Social Services under section 17 of the Children’s Act is estimated using an FOI sent to all county and unitary authorities in England, asking what this figure was as at 30th June 2022 or the nearest available date. We received full responses from 90 local authorities (58%) and partial responses from a further 6 councils (4%) who did not provide the full requested data. Not all councils hold or are able to access this data. We report on the numbers supplied via the FOI. Data and knowledge on these households is scant, so no extrapolation or averaging up is done, meaning that this figure is an underestimate.</p>
[6]	<p>Estimated total number of homeless children</p> <p>This is the estimated total number of children who are homeless. At the national level it sums up the number of children living in temporary accommodation arranged by the local authority under homelessness legislation and the number of children living in temporary accommodation arranged by Social Services under Section 17 of the Children’s Act.</p>
[7]	<p>Estimated total number of homeless people</p> <p>This is the estimated total number of people who are homeless. At the national level it sums up all five of the elements above [1-5], at regional and local level just the first three elements [1-3].</p>
[8]	<p>Rate of homelessness</p> <p>This is the rate of people who are homeless in the respected area, calculated by comparing the estimated number of people who are homeless to the total population of the area, using the latest available ONS population statistics.⁴</p>

³ Homeless Link, [Support for Single Homeless People in England: Annual Review 2021](#), August 2022

⁴ ONS, [Population and household estimates, England and Wales: Census 2021](#), P01

National and regional results

Table 1: Estimated number of people who are homeless as at a given night in 2022, by type of homelessness, England

[1] Est. no. of people homeless and living in TA arranged by the council	[2] Est. no. of people homeless and living in TA arranged by them or homeless at home	[3] No. of people sleeping on the streets on a given night	[4] Est. no single homeless people living in hostels	[5] No. people living in accommodation provided by social services	[6] Est. total no. of homeless children	[7] Est. total no. homeless people	[8] Rate of homelessness (1 in X people)
England total							
245,590	4,504	2,440	15,329	3,558	122,761	271,421	208
See methodology for sources and methods of tables							

- We estimate that on a given night in 2022 there will have been over 271,000 people recorded as homeless in England, which is a rate of 1 in 208 people
- This population is mainly made up of people who are homeless and living in temporary accommodation (almost 250,000)
- There are an estimated 123,000 homeless children, comprising almost half (45%) of all people recorded as homeless in England

Table 2: Estimated number of people who are homeless as at a given night in 2022, by type of homelessness, by region of England

	[1] Est. no. of people homeless and living in TA arranged by the council	[2] Est. no. of people homeless and living in TA arranged by them or homeless at home	[3] No. of people sleeping on the streets on a given night	[6] No. of homeless children in TA	[7] Est. total no. homeless people	[8] Rate of homelessness (1 in X people)
Regions of England						
North East	1,100	100	50	360	1,250	2,118
North West	14,230	189	200	6,720	14,619	507
Yorkshire and The Humber	4,540	369	170	2,020	5,079	1,079
East Midlands	5,570	183	180	2,600	5,933	822
West Midlands	18,980	1,232	190	10,540	20,402	292
East of England	16,630	331	240	8,280	17,201	368
London	148,870	1,232	640	73,810	150,742	58
South East	25,940	442	450	12,030	26,832	346
South West	9,700	402	330	4,350	10,432	546
Notes: In this regional table [7] is the sum of rough sleepers and those in council temporary accommodation, or who are homeless at home or living in TA arranged by themselves. Regional totals will not always sum to the national totals due to imputations. See 'Notes and references for tables' for details of sources and methods						

Local level results

Table 3: Top 30 highest local rates of people who are homeless (living in temporary accommodation or sleeping on the streets), England only

Nat. rank	Local authority	Reg.	[1] Est. no. of people homeless and living in TA arranged by the council	[2] Est. no. of people homeless and living in TA arranged by them or homeless at home	[3] No. of people sleeping on the streets on a given night	[6] No. of homeless children in TA	[7] Est. total no. homeless people	[8] Rate of homelessness (1 in X people)
1	Newham	Lon	16,568	0	17	8,363	16,585	21
2	Westminster	Lon	7,280	0	187	3,615	7,467	27
3	Haringey	Lon	7,986	0	10	4,295	7,996	33
4	Hackney	Lon	7,555	0	11	3,781	7,566	34
5	Redbridge	Lon	8,096	0	15	4,117	8,111	38
6	Lewisham	Lon	7,293	0	7	3,885	7,300	41
7	Wandsworth	Lon	7,183	0	18	3,337	7,201	45
8	Southwark	Lon	6,729	3	10	2,784	6,742	46
9	Barking and Dagenham	Lon	4,411	0	0	2,408	4,411	50
10	Ealing	Lon	6,852	35	23	3,441	6,910	53
11	Hammersmith and Fulham	Lon	3,018	0	0	1,597	3,018	61
12	Enfield	Lon	5,157	0	21	1,619	5,178	64
13	Greenwich	Lon	4,465	0	9	2,515	4,474	65
14	Luton	East	3,413	23	7	1,851	3,443	65
15	Kingston upon Thames	Lon	2,273	0	28	1,070	2,301	73
16	Barnet	Lon	5,122	139	13	2,303	5,274	74
17	Manchester	N W	7,407	0	43	3,649	7,450	74
18	Kensington and Chelsea	Lon	1,915	0	11	863	1,926	74
19	Croydon	Lon	5,191	0	11	2,632	5,202	75
20	Harrow	Lon	3,477	0	0	1,875	3,477	75
21	Brighton and Hove	S E	3,538	0	37	1,360	3,575	78
22	Birmingham	W M	14,236	0	31	8,312	14,267	80
23	Waltham Forest	Lon	3,336	0	5	1,851	3,341	83
24	Bromley	Lon	3,836	0	0	1,826	3,836	86

25	Brent	Lon	3,493	0	17	2,007	3,510	97
26	Bexley	Lon	2,393	0	7	1,231	2,400	103
27	Sutton	Lon	2,027	0	0	967	2,027	103
28	Hastings	SE	830	0	23	314	853	107
29	Islington	Lon	1,916	0	13	858	1,929	112
30	Havering	Lon	2,325	0	0	1,150	2,325	113

See methodology for sources and methods of tables

Table 4: Top 3 highest local rates of people who are homeless (living in temporary accommodation or sleeping on the streets) by region, England (excluding London)

Reg. rank	Local authority	[1] Est. no. of people homeless and living in TA arranged by the council	[2] Est. no. of people homeless and living in TA arranged by them or homeless at home	[3] No. of people sleeping on the streets on a given night	[6] No. of homeless children in TA	[7] Est. total no. homeless people	[8] Rate of homelessness (1 in X people)	Nat. rank
East of England								
1	Luton	3,413	23	7	1,851	3,443	65	14
2	Basildon	1,517	0	0	780	1,517	124	33
3	Harlow	615	0	0	328	615	152	36
East Midlands								
1	Nottingham	1,591	0	23	898	1,614	201	45
2	Charnwood	327	44	0	152	371	496	98
3	Leicester	710	0	8	190	718	513	101
North East								
1	Gateshead	186	43	0	64	229	855	147
2	Newcastle u. Tyne	221	2	9	57	232	1,296	184
3	Darlington	81	0	0	27	81	1,331	188
North West								
1	Manchester	7,407	0	43	3,649	7,450	74	17
2	Salford	953	7	8	433	968	279	59
3	Oldham	662	0	0	336	662	366	77
South East								
1	Brighton and Hove	3,538	0	37	1,360	3,575	78	21
2	Hastings	830	0	23	314	853	107	28
3	Milton Keynes	2,336	0	18	1,182	2,354	122	32
South West								
1	Bristol	2,517	0	68	1,134	2,585	183	41
2	Torridge	206	31	7	119	244	279	58
3	Plymouth	707	98	23	269	828	320	66
West Midlands								
1	Birmingham	14,236	0	31	8,312	14,267	80	22
2	Coventry	1,740	16	12	895	1,768	195	43
3	Solihull	456	63	0	262	519	416	86
Yorkshire and the Humber								
1	Scarborough	123	128	15	34	266	409	84
2	Wakefield	650	2	5	264	657	538	105
3	Kirklees	726	0	5	418	731	593	111
See methodology for sources and methods of tables								

Table 5: All local rates of people who are homeless (living in temporary accommodation or sleeping on the streets), England only

Reg. rank	Local authority	[1] Est. no. of people homeless and living in TA arranged by the council	[2] Est. no. of people homeless and living in TA arranged by them or homeless at home	[3] No. of people sleeping on the streets on a given night	[6] No. of homeless children in TA	[7] Est. total no. homeless people	[8] Rate of homelessness (1 in X people)
East of England							
1	Luton	3,413	23	7	1,851	3,443	65
2	Basildon	1,517	0	0	780	1,517	124
3	Harlow	615	0	0	328	615	152
4	Bedford	885	0	0	352	885	209
5	Chelmsford	791	0	13	420	804	226
6	Peterborough	915	0	36	488	951	227
7	Broxbourne	411	3	0	225	414	239
8	Thurrock	653	0	0	337	653	270
9	Stevenage	317	0	14	141	331	270
10	Dacorum	494	3	5	205	502	309
11	Castle Point	272	8	0	133	280	320
12	Southend-on-Sea	519	0	10	255	529	342
13	Welwyn Hatfield	337	0	0	169	337	356
14	Colchester	530	0	0	300	530	364
15	Watford	245	3	6	116	254	403
16	Rochford	198	5	0	112	203	421
17	Tendring	334	0	0	175	334	443
18	Cambridge	296	0	14	111	310	470
19	North Hertfordshire	230	51	0	108	281	474
20	Hertsmere	211	0	0	98	211	511
21	Great Yarmouth	180	0	9	77	189	528
22	Epping Forest	222	0	0	103	222	608
23	Breckland	223	0	8	92	231	613
24	St Albans	233	0	8	115	241	615
25	Three Rivers	137	10	0	69	147	637
26	Central Bedfordshire	441	20	0	209	461	638
27	Huntingdonshire	241	0	7	100	248	729
28	Fenland	115	10	9	54	134	764
29	King's Lynn and West Norfolk	173	15	0	58	188	820
30	West Suffolk	165	20	9	73	194	925
31	East Suffolk	249	0	15	140	264	931
32	East Hertfordshire	76	79	5	33	160	939
33	North Norfolk	100	0	0	44	100	1,030
34	Maldon	62	0	0	35	62	1,068
35	Ipswich	118	5	0	55	123	1,135
36	Babergh	80	0	0	23	80	1,154

37	South Cambridgeshire	123	13	0	49	136	1,194
38	Braintree	125	0	5	75	130	1,194
39	Mid Suffolk	86	0	0	34	86	1,194
40	Brentwood	59	0	0	30	59	1,305
41	Uttlesford	65	0	0	38	65	1,405
42	East Cambridgeshire	44	0	0	23	44	1,993
43	Broadland	57	8	0	22	65	2,038
44	South Norfolk	43	25	0	15	68	2,074
45	Norwich	37	3	10	9	50	2,907

Reg. rank	Local authority	[1] Est. no. of people homeless and living in TA arranged by the council	[2] Est. no. of people homeless and living in TA arranged by them or homeless at home	[3] No. of people sleeping on the streets on a given night	[6] No. of homeless children in TA	[7] Est. total no. homeless people	[8] Rate of homelessness (1 in X people)
East Midlands							
1	Nottingham	1,591	0	23	898	1,614	201
2	Charnwood	327	44	0	152	371	496
3	Leicester	710	0	8	190	718	513
4	West Northamptonshire	749	44	15	318	808	527
5	Oadby and Wigston	62	39	0	30	101	571
6	Derby	375	0	11	196	386	677
7	North Northamptonshire	505	2	12	239	519	692
8	Lincoln	133	0	14	61	147	707
9	Hinckley and Bosworth	86	16	5	41	107	1,061
10	High Peak	82	0	0	37	82	1,109
11	Gedling	75	18	0	45	93	1,257
12	Ashfield	82	0	6	39	88	1,435
13	Rutland	14	14	0	9	28	1,477
14	South Kesteven	97	0	0	44	97	1,478
15	Mansfield	55	0	10	21	65	1,700
16	Bassetlaw	48	2	17	16	67	1,751
17	Broxtowe	62	0	0	26	62	1,789
18	Boston	26	0	6	8	32	2,203
19	Blaby	34	2	0	14	36	2,835
20	East Lindsey	43	7	0	20	50	2,853
21	Newark and Sherwood	36	0	7	15	43	2,858
22	South Derbyshire	35	0	0	19	35	3,063
23	North West Leicestershire	33	0	0	8	33	3,173
24	North East Derbyshire	31	0	0	11	31	3,290
25	North Kesteven	35	0	0	12	35	3,371
26	Chesterfield	24	0	5	4	29	3,572
27	Melton	14	0	0	6	14	3,700
28	Erewash	28	0	0	16	28	4,032
29	Rushcliffe	26	0	0	12	26	4,577
30	Harborough	21	0	0	8	21	4,648
31	Amber Valley	26	0	0	13	26	4,854
32	Derbyshire Dales	12	0	0	6	12	5,958
33	West Lindsey	14	0	0	6	14	6,800
34	South Holland	0	0	5	0	5	19,020
35	Bolsover	0	0	0	0	0	-

Reg. rank	Local authority	[1] Est. no. of people homeless and living in TA arranged by the council	[2] Est. no. of people homeless and living in TA arranged by them or homeless at home	[3] No. of people sleeping on the streets on a given night	[6] No. of homeless children in TA	[7] Est. total no. homeless people	[8] Rate of homelessness (1 in X people)
London							
1	Newham	16,568	0	17	8,363	16,585	21
2	Westminster	7,280	0	187	3,615	7,467	27
3	Haringey	7,986	0	10	4,295	7,996	33
4	Hackney	7,555	0	11	3,781	7,566	34
5	Redbridge	8,096	0	15	4,117	8,111	38
6	Lewisham	7,293	0	7	3,885	7,300	41
7	Wandsworth	7,183	0	18	3,337	7,201	45
8	Southwark	6,729	3	10	2,784	6,742	46
9	Barking and Dagenham	4,411	0	0	2,408	4,411	50
10	Ealing	6,852	35	23	3,441	6,910	53
11	Hammersmith and Fulham	3,018	0	0	1,597	3,018	61
12	Enfield	5,157	0	21	1,619	5,178	64
13	Greenwich	4,465	0	9	2,515	4,474	65
14	Kingston upon Thames	2,273	0	28	1,070	2,301	73
15	Barnet	5,122	139	13	2,303	5,274	74
16	Kensington and Chelsea	1,915	0	11	863	1,926	74
17	Croydon	5,191	0	11	2,632	5,202	75
18	Harrow	3,477	0	0	1,875	3,477	75
19	Waltham Forest	3,336	0	5	1,851	3,341	83
20	Bromley	3,836	0	0	1,826	3,836	86
21	Brent	3,493	0	17	2,007	3,510	97
22	Bexley	2,393	0	7	1,231	2,400	103
23	Sutton	2,027	0	0	967	2,027	103
24	Islington	1,916	0	13	858	1,929	112
25	Havering	2,325	0	0	1,150	2,325	113
26	Camden	1,176	578	97	509	1,851	113
27	City of London	23	0	20	9	43	200
28	Hillingdon	1,483	21	9	761	1,513	202
29	Richmond upon Thames	803	0	0	376	803	243
30	Merton	671	0	5	331	676	318
31	Hounslow	0	0	0	0	0	-

Reg. rank	Local authority	[1] Est. no. of people homeless and living in TA arranged by the council	[2] Est. no. of people homeless and living in TA arranged by them or homeless at home	[3] No. of people sleeping on the streets on a given night	[6] No. of homeless children in TA	[7] Est. total no. homeless people	[8] Rate of homelessness (1 in X people)
North East							
1	Gateshead	186	43	0	64	229	855
2	Newcastle upon Tyne	221	2	9	57	232	1,296
3	Darlington	81	0	0	27	81	1,331
4	North Tyneside	122	0	0	47	122	1,713
5	Middlesbrough	63	0	0	27	63	2,284
6	County Durham	173	42	11	86	226	2,314
7	Sunderland	75	3	5	13	83	3,290
8	Stockton-on-Tees	54	0	0	7	54	3,641
9	South Tyneside	33	0	0	5	33	4,479
10	Northumberland	68	0	0	24	68	4,715
11	Redcar and Cleveland	22	0	0	3	22	6,205
12	Hartlepool	0	0	0	0	0	-

Reg. rank	Local authority	[1] Est. no. of people homeless and living in TA arranged by the council	[2] Est. no. of people homeless and living in TA arranged by them or homeless at home	[3] No. of people sleeping on the streets on a given night	[6] No. of homeless children in TA	[7] Est. total no. homeless people	[8] Rate of homelessness (1 in X people)
North West							
1	Manchester	7,407	0	43	3,649	7,450	74
2	Salford	953	7	8	433	968	279
3	Oldham	662	0	0	336	662	366
4	Tameside	552	0	5	287	557	415
5	Liverpool	1,058	0	20	465	1,078	451
6	Bolton	457	0	10	187	467	634
7	Rochdale	323	0	6	142	329	680
8	Bury	272	0	0	139	272	713
9	Blackpool	176	0	14	60	190	743
10	South Lakeland	32	87	9	5	128	814
11	Wigan	346	5	5	160	356	926
12	Trafford	243	0	0	115	243	967
13	South Ribble	98	12	0	47	110	1,011
14	Knowsley	121	12	0	58	133	1,163
15	Stockport	239	0	7	115	246	1,198
16	Cheshire W & Chester	287	0	8	90	295	1,211
17	St. Helens	84	52	0	46	136	1,348
18	Preston	73	0	6	25	79	1,872
19	Chorley	57	0	5	15	62	1,900
20	Burnley	43	0	6	16	49	1,933
21	Warrington	97	0	10	49	107	1,971
22	Blackburn with Darwen	65	0	11	31	76	2,037
23	Rossendale	34	0	0	16	34	2,082
24	Ribble Valley	29	0	0	18	29	2,121
25	Lancaster	63	0	0	30	63	2,268
26	Fylde	34	0	0	12	34	2,394
27	Wirral	132	0	0	64	132	2,426
28	Eden	21	0	0	13	21	2,605
29	Copeland	23	0	0	11	23	2,917
30	Sefton	93	0	0	37	93	3,003
31	West Lancashire	34	0	0	12	34	3,453
32	Barrow-in-Furness	17	0	0	7	17	3,965
33	Pendle	21	0	0	4	21	4,562
34	Carlisle	17	0	0	1	17	6,471
35	Hyndburn	11	0	0	4	11	7,473
36	Wyre	12	2	0	5	14	7,793
37	Allerdale	12	0	0	1	12	8,008
38	Cheshire East	32	0	0	14	32	12,463
39	Halton	0	0	0	0	0	-

Reg. rank	Local authority	[1] Est. no. of people homeless and living in TA arranged by the council	[2] Est. no. of people homeless and living in TA arranged by them or homeless at home	[3] No. of people sleeping on the streets on a given night	[6] No. of homeless children in TA	[7] Est. total no. homeless people	[8] Rate of homelessness (1 in X people)
South East							
1	Brighton and Hove	3,538	0	37	1,360	3,575	78
2	Hastings	830	0	23	314	853	107
3	Milton Keynes	2,336	0	18	1,182	2,354	122
4	Epsom and Ewell	624	0	0	319	624	130
5	Slough	1,102	9	19	521	1,130	140
6	Worthing	714	0	15	242	729	153
7	Dartford	732	0	6	367	738	158
8	Crawley	717	0	8	337	725	163
9	Swale	908	0	6	404	914	166
10	New Forest	897	0	6	381	903	195
11	Gravesham	488	0	5	260	493	217
12	Isle of Wight	621	0	5	328	626	224
13	Gosport	334	0	0	141	334	245
14	Reading	405	221	22	209	648	269
15	Dover	406	5	5	191	416	280
16	Medway	969	0	11	542	980	286
17	Adur	218	5	0	84	223	290
18	Windsor and Maidenhead	482	12	0	243	494	311
19	Arun	426	70	17	220	513	321
20	Thanet	415	0	14	176	429	328
21	Bracknell Forest	374	0	0	208	374	333
22	Reigate and Banstead	436	0	0	223	436	346
23	Rother	248	0	0	101	248	375
24	Horsham	341	42	7	177	390	376
25	Southampton	650	0	9	376	659	378
26	Spelthorne	254	16	0	127	270	381
27	Maidstone	402	0	0	194	402	437
28	Portsmouth	416	0	24	179	440	473
29	Ashford	273	0	0	116	273	486
30	Sevenoaks	243	0	0	123	243	496
31	Tonbridge and Malling	264	0	0	124	264	501
32	Fareham	196	0	7	78	203	564
33	Havant	218	0	0	94	218	570
34	East Hampshire	220	0	0	90	220	571
35	Mole Valley	137	0	0	72	137	638
36	Runnymede	135	0	0	79	135	653
37	Canterbury	213	0	18	103	231	681
38	Tunbridge Wells	167	0	0	83	167	690
39	Oxford	203	0	24	84	227	714
40	Chichester	166	0	0	59	166	748

41	Buckinghamshire	707	0	0	330	707	782
42	Elmbridge	165	0	5	79	170	816
43	Mid Sussex	161	2	6	63	169	901
44	Rushmoor	101	7	0	41	108	924
45	Wokingham	183	7	0	84	190	934
46	Surrey Heath	87	0	5	38	92	984
47	West Berkshire	135	0	0	77	135	1,196
48	Woking	76	9	0	32	85	1,218
49	Tandridge	72	0	0	41	72	1,221
50	Guildford	99	2	8	37	109	1,313
51	Folkestone and Hythe	67	0	8	34	75	1,464
52	West Oxfordshire	73	0	5	14	78	1,464
53	Test Valley	80	0	0	15	80	1,631
54	Wealden	91	0	0	40	91	1,759
55	Cherwell	82	0	6	46	88	1,830
56	Hart	47	0	0	24	47	2,115
57	Winchester	58	0	0	16	58	2,198
58	Basingstoke and Deane	82	0	0	39	82	2,259
59	Eastleigh	43	0	0	18	43	3,172
60	Lewes	8	0	11	0	19	5,258
61	Vale of White Horse	20	0	0	6	20	6,945
62	South Oxfordshire	20	0	0	6	20	7,455
63	Waverley	3	0	0	3	3	42,733

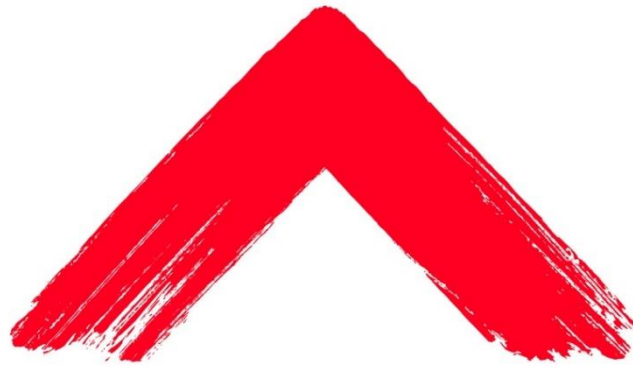
Reg. rank	Local authority	[1] Est. no. of people homeless and living in TA arranged by the council	[2] Est. no. of people homeless and living in TA arranged by them or homeless at home	[3] No. of people sleeping on the streets on a given night	[6] No. of homeless children in TA	[7] Est. total no. homeless people	[8] Rate of homelessness (1 in X people)
South West							
1	Bristol	2,517	0	68	1,134	2,585	183
2	Torridge	206	31	7	119	244	279
3	Plymouth	707	98	23	269	828	320
4	Cornwall	1,600	49	28	744	1,677	340
5	Bournemouth, Christchurch and Poole	1,017	49	29	469	1,095	366
6	Torbay	296	36	17	130	349	399
7	Gloucester	270	29	7	116	306	433
8	Dorset	698	7	13	294	718	529
9	Exeter	196	0	14	62	210	623
10	Swindon	343	0	10	139	353	661
11	North Devon	133	0	7	62	140	704
12	Somerset West and Taunton	197	0	6	74	203	775
13	Mid Devon	77	11	5	33	93	889
14	North Somerset	163	2	19	59	184	1,176
15	Teignbridge	105	0	5	51	110	1,225
16	Forest of Dean	67	0	0	29	67	1,299
17	South Gloucestershire	196	2	0	98	198	1,465
18	Wiltshire	258	76	11	117	345	1,479
19	Tewkesbury	59	0	0	26	59	1,608
20	Sedgemoor	60	0	11	17	71	1,766
21	Stroud	65	0	0	19	65	1,863
22	East Devon	72	0	8	28	80	1,885
23	Bath and North East Somerset	87	0	14	39	101	1,915
24	South Somerset	84	0	0	41	84	2,056
25	Cheltenham	46	0	8	22	54	2,200
26	South Hams	33	0	0	18	33	2,685
27	Mendip	33	0	10	15	43	2,700
28	Cotswold	31	0	0	6	31	2,929
29	West Devon	17	0	0	8	17	3,359
30	Isles of Scilly	0	0	0	0	0	-

Reg. rank	Local authority	[1] Est. no. of people homeless and living in TA arranged by the council	[2] Est. no. of people homeless and living in TA arranged by them or homeless at home	[3] No. of people sleeping on the streets on a given night	[6] No. of homeless children in TA	[7] Est. total no. homeless people	[8] Rate of homelessness (1 in X people)
West Midlands							
1	Birmingham	14,236	0	31	8,312	14,267	80
2	Coventry	1,740	16	12	895	1,768	195
3	Solihull	456	63	0	262	519	416
4	Nuneaton and Bedworth	273	0	0	114	273	492
5	Shropshire	531	6	21	147	558	580
6	East Staffordshire	75	133	0	8	208	597
7	Worcester	115	38	20	60	173	601
8	Herefordshire, County of	236	0	12	112	248	754
9	Tamworth	44	35	0	25	79	998
10	Redditch	78	6	0	34	84	1,032
11	Telford and Wrekin	167	0	0	92	167	1,111
12	Walsall	235	3	0	135	238	1,193
13	Lichfield	39	38	0	24	77	1,384
14	Sandwell	210	0	0	129	210	1,628
15	Warwick	83	0	6	13	89	1,669
16	Stratford-on-Avon	75	3	0	19	78	1,723
17	Wyre Forest	44	0	0	9	44	2,309
18	Bromsgrove	42	0	0	19	42	2,362
19	Wolverhampton	85	0	5	51	90	2,930
20	Dudley	68	25	0	36	93	3,469
21	Wychavon	34	3	0	11	37	3,566
22	Stoke-on-Trent	43	6	21	4	70	3,675
23	Cannock Chase	3	19	0	3	22	4,579
24	Newcastle-under-Lyme	17	0	7	7	24	5,138
25	Stafford	16	0	8	6	24	5,700
26	Staffordshire Moorlands	15	0	0	7	15	6,387
27	Malvern Hills	0	0	6	0	6	13,233
28	South Staffordshire	4	0	0	4	4	27,625
29	North Warwickshire	0	0	0	0	0	-
30	Rugby	0	0	0	0	0	-

Reg. rank	Local authority	[1] Est. no. of people homeless and living in TA arranged by the council	[2] Est. no. of people homeless and living in TA arranged by them or homeless at home	[3] No. of people sleeping on the streets on a given night	[6] No. of homeless children in TA	[7] Est. total no. homeless people	[8] Rate of homelessness (1 in X people)
Yorkshire and the Humber							
1	Scarborough	123	128	15	34	266	409
2	Wakefield	650	2	5	264	657	538
3	Kirklees	726	0	5	418	731	593
4	Kingston upon Hull, City of	293	93	11	155	397	672
5	Doncaster	418	15	20	209	453	680
6	North East Lincolnshire	202	0	10	55	212	740
7	Sheffield	669	2	18	233	689	807
8	Harrogate	141	0	0	66	141	1,154
9	East Riding of Yorkshire	282	2	7	132	291	1,175
10	Calderdale	175	0	0	85	175	1,181
11	Ryedale	13	24	0	3	37	1,483
12	Bradford	327	0	18	145	345	1,584
13	Richmondshire	20	7	0	10	27	1,874
14	York	108	0	0	47	108	1,878
15	Barnsley	93	4	7	42	104	2,344
16	Rotherham	64	48	0	29	112	2,378
17	Leeds	168	0	25	63	193	4,207
18	North Lincolnshire	28	0	6	8	34	4,991
19	Craven	10	0	0	3	10	5,690
20	Selby	13	0	0	4	13	7,077
21	Hambleton	8	2	0	2	10	8,916

**We exist to defend the right to a
safe home and fight the devastating
impact the housing emergency
has on people and society.**

We do this with campaigns, advice
and support – and we never give up.
We believe that home is everything.



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