



The Castle Point Plan

Housing Topic Paper

August 2025



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1. Background

- 1.1. The purpose of this topic paper is to explain the background to the housing policies contained within the Castle Point Plan 2026-2043. It addresses strategic policies such as housing requirements, affordable housing, specialist housing needs, and site allocations, as well as development management policies that guide planning applications.
- 1.2. The topic paper does not contain any policies, proposals or site allocations. Topic papers form part of the Local Plan evidence base which will be submitted alongside the Plan for independent examination. This paper includes references to national housing policy and recent government proposals. Details of specific proposed site allocations are covered in the Strategic Land Availability Assessment (SLAA) and the Sustainability Appraisal (SA).
- 1.3. Castle Point Borough Council (CPBC) is a small but densely populated local authority in South Essex, with significant environmental and infrastructure constraints that impact housing delivery. The borough consists of the urban areas of Canvey Island, Benfleet, Hadleigh, Thundersley and Daws Heath, which are surrounded by extensive Green Belt land. This makes urban capacity assessments and brownfield land redevelopment essential components of the housing strategy.

2. National Policy

- 2.1. On 30th July 2024 the Ministry of Housing, Communities and Local Government (MHCLG) under the new Labour Government launched [a consultation](#) on reforms to the National Planning Policy Framework (NPPF). The consultation ran until the 24th September 2024. The new Government's pledge is to build 1.5 million new homes. This is a major shift in policy direction from the previous revision to the NPPF undertaken in December 2023, which made housing targets only advisory.
- 2.2. The consultation proposed significant changes and additions to drive these objectives and more broadly stimulate economic development. It expunged many of the previous administration's December 2023 NPPF changes. The Government considers the changes vital to deliver their commitments to achieve economic growth and increase house building. The key revisions largely focused on strengthening of the drive to meet housing and other development needs.
- 2.3. The revised version of the NPPF was published in December 2024 and sets out the Government's policies to support the achievement of sustainable development. Several policies in the NPPF relate explicitly to issues of overall housing supply:

Paragraph 20: Strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for homes (including affordable housing).

Paragraph 61: to support the objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed.

Paragraph 62: To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

Paragraph 78: Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local Planning Authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.

3. Local Policy

- 3.1. The current Local Plan for Castle Point was adopted in November 1998. It was saved in its totality until 28th September 2007. Since that date only certain policies are still in place as saved policies. These will be replaced by policies in the Castle Point Plan in due course. Until such time as the Castle Point Plan is adopted, the 1998 adopted Local Plan should be considered alongside the NPPF in planning decisions making.

4. Housing Need and Requirement

Local Housing Need (LHN) calculation

- 4.1. A key revision proposed in the July 2024 NPPF consultation was to change the Standard Method (SM) for calculating housing need to use housing stock instead of household predictions. The revised method has as its starting point a multiplier of 0.8% of existing housing stock, plus a revised affordability adjustment. The housing affordability ratio is defined as the median house price divided by the median gross annual workplace-based earnings.
- 4.2. The baseline stock figure is adjusted upwards in areas where house prices are more than four times higher than earnings: for every 1% above that 4:1 ratio, the multiplier increases to 0.6% rather than the previous method which applies a 0.25% multiplier. The NPPF removes the previous 40% cap on any uplift above the previously adopted local plan housing figure as well as the 35% uplift that applied to the 20 largest cities.
- 4.3. For Castle Point, using the new formulae resulted in a massive increase in local housing need calculated at 68 annual dwellings at the time of consultation, compared to 349 under the previous version of the formulae which used demographic forecasts as its basis. This is a very large increase for a district which is considered to be highly constrained when it comes to identifying land for development.
- 4.4. The methodology for calculating LHN under the new standard method formulae which should be followed is set out in the Planning Practice Guidance (PPG)¹. The NPPF expects strategic policy-making authorities to follow the standard method in this guidance to assess the LHN. The PPG also sets out that the housing target generated from the standard method may change as the inputs are variable. Under the government's revised December 2024 standard methodology Castle Point's latest annual housing need has been as at 701 homes per year. This was recalculated for the Borough in June 2025 using the result of updated information on affordability ratios and housing stock data. The revised calculation in appendix 1 now shows a need for 686 dwelling per annum.
- 4.5. In 2023, Castle Point Borough experienced a notable decline in housing affordability from 11.43 in 2023 to 9.31 in 2024, indicating a significant improvement in affordability within a year. To provide context, the affordability ratios for the East of England and England as a whole in 2024 were 9.07 and 7.71, respectively. This positions Castle Point as less affordable than both the regional and national averages during that year. Analysts attribute this improvement to the continued cost-of-living crisis with households now having to spend a greater proportion of their income on necessities including heating and food, and thereby having less resource to compete in the housing market, which has constrained house price increases. This, however, should not be interpreted as being indicative of a trend in improvement in housing market affordability. It is likely that the opposite is true.

¹ [Housing and economic needs assessment - GOV.UK](#)

The Housing Requirement

- 4.6. As explained above the standard method uses a formula that incorporates a baseline of local housing stock which is then adjusted upwards to reflect local affordability pressures to identify the minimum number of homes expected to be planned for. The formulae identifies the minimum annual housing need figure. It does not produce a housing requirement figure. The housing requirement is the minimum number of homes that a plan seeks to provide during the plan period. Therefore it should be noted that the LHN is not the same as the housing requirement for a local plan.
- 4.7. The Plan proposes an average 364 dwellings per annum (dpa) – a housing requirement that will boost supply in Castle Point by around 360 % compared with the borough's long-term average delivery rate of just 99 dpa (215 - 2025 completions monitoring). This is a deliberately ambitious step-change that goes well beyond recent trends and therefore meets the NPPF expectation to significantly boost the supply of homes.
- 4.8. Although this requirement sits below the Standard-Method figure of 686 dpa, it nevertheless represents a substantial uplift that is both realistic and deliverable in the local market context. A higher target would face two inter-linked constraints.
- 4.9. The PPG states that once a local housing need figure has been established authorities should then make an assessment of the amount of new homes that can be provided for in their area. This should be justified by evidence on land availability, constraints on development and any other relevant matters.

5. Urban Capacity Study

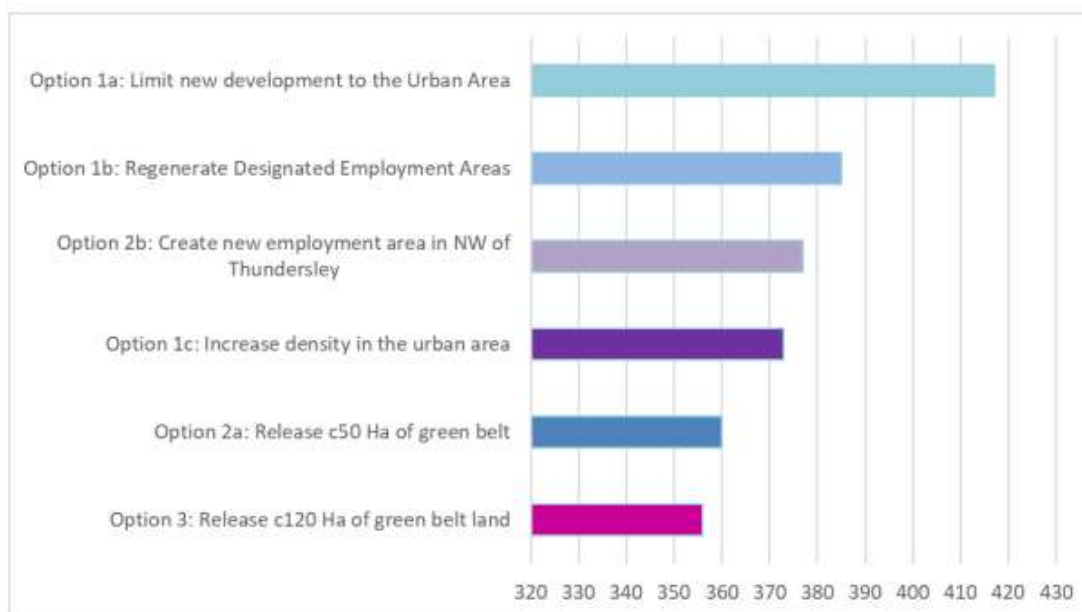
- 5.1. In July 2024 an Urban Capacity Assessment was undertaken in the Borough-Wide Development Options Technical Paper as part of the emerging SLAA which can be found [here](#)² It was produced and published to support the consultation on issues and options. This assessment established the maximum realistic number of new dwellings that could be delivered within the existing urban area, prior to considering any release of Green Belt land at that point in time.
- 5.2. It set out a detailed and evidence-based assessment of the urban land available for housing development within the borough. It quantifies and evaluates the capacity of the borough's urban areas to accommodate new housing, in accordance with the requirements of the NPPF, PPG, and relevant local plan-making regulations.
- 5.3. The key finding after considering all extant development, and all potential urban capacity was that there is a potential urban capacity to accommodate 3,730 new homes.
- 5.4. In order to determining the urban capacity within the borough, the following sources of land supply were considered to establish what is suitable and available:
- Completions
 - Extant permissions
 - Windfall
 - Call For Sites in early 2024
 - Allocated sites from the adopted 1998 Local Plan that have not been developed
 - Brownfield Land Register (BLR) sites
 - Strategic Housing Land Availability Assessment, 2018 sites [General Evidence Documents | Castlepoint](#)
 - Additional land identified by the Council
- 5.5. Only sites that could accommodate more than 6 units were considered and assessed; this was based on a density assumption of 50 dwellings per hectare. For sites that fell below that threshold it was assumed that they would fall within the small sites windfall allowance. Additional modelling incorporated higher densities where appropriate, reflecting recent local examples of intensification.
- 5.6. To ensure accuracy in estimating capacity, sites were grouped into 13 geographic clusters. Each cluster was assigned a tailored density based on a review of recent planning permissions and local development patterns. Examples included:
- Hadleigh Central: 125 dph
 - Canvey Town Centre East: 104 dph
 - South Benfleet Town Centre: 126 dph
- 5.7. Isolated sites not within a defined cluster were modelled at the borough-wide average density of 112 dph.

² [Borough Wide Development Options Technical Paper, July 2024](#)

- 5.8. The known development supply as at 1st April 2024 was 1,523 dwellings.
- 5.9. Following site identification, density modelling, and uncertainty discounting, the Council was able to identify a further 2,204 of potential dwellings from new urban development opportunities considered suitable (table 1 of the Borough Wide Development Options Technical Paper 2024)².
- 5.10. The total net deliverable urban housing capacity in Castle Point at the time was assessed at 3,727 dwellings. This figure formed the basis for the spatial strategy options that prioritise development within the existing urban area.
- 5.11. The assessment reflected a comprehensive and transparent led approach to identifying urban capacity, in line with national guidance. It provided the critical baseline for evaluating the sustainability, deliverability, and spatial implications of alternative growth options for the Castle Point Plan. Importantly assumptions of the assessment remains valid and applicable.
- 5.12. To further boost the housing supply within the urban area and ensure that the Castle Point Plan makes effective use of land in accordance with Chapter 11 of the NPPF, a Density and Capacity Study (July 2025) was undertaken to determine site constraints and opportunities and high level urban design principles to justify the urban sites potential capacity. This allows us to understand the maximum increase in density that the urban areas of the Borough can take while still maintaining the character and distinctive urban design found within Castle Point.
- 5.13. The work separated the Borough into 6 character areas which are able to take the following densities:

Area	Density (dwellings per hectare)
Neighbourhood Hub	150
Primary Corridor	125
Suburban Corridor	100
Estuary Edge	70
Natural Edge	70
Canvey Seafront	100

- 5.14. The key findings of the work found that the allocations within the Castle Point Plan Regulation 19 Draft, can provide a total of 4,868 homes between 2026 and 2043.
- 5.15. Through the Issues and Options Consultation (July to September 2024), residents were clear that there was a strong preference for urban intensification and regeneration of employment land, this is shown in the graph below. This concept is explored further in the Employment Topic Paper.



6. Reviewing the Green Belt

- 6.1. Castle Point Borough Council faces severe land constraints that make it unrealistic to meet the unconstrained local housing need of 686 dwellings per annum as calculated using the latest affordability and housing stock data for the SM. This is set out in detail in the Housing Capacity Topic Paper. A high level summary for the reasons why the constraints limit the availability of developable land in the Borough is set out below:

The Green Belt Review

- 6.2. A large proportion of the borough (around 53%) is designated as Green Belt, significantly restricting potential housing development. The NPPF in 2024 introduced the concept of grey belt land which is land within the Green Belt which is either previously developed land and/or any other land, that does not strongly contribute to meeting the Green Belt purposes a, b or d. Grey belt excludes land which are Habitat Sites including Special Areas of Conservation (SAC) and Special Protection Areas (SPA, Sites of Special Scientific Interest (SSSI), Local Green Spaces, National Landscapes, National Parks, Heritage Coast, irreplaceable habitats, designated heritage assets or areas at risk of flooding or coastal change. Paragraph 148 states *“where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt, which is not previously developed, and then other Green Belt locations”*. A Green Belt Assessment (July 2025) has been prepared to support the Castle Point Plan, in accordance with the NPPF and PPG. This identifies a number of areas across the Borough which are not considered suitable for development, due to their contribution to the Green Belt purposes or existing designations.
- 6.3. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site’s location is appropriate with particular reference to paragraphs 110 and 115 of this Framework. Under Paragraph 110 development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. Under paragraph 115 there should be safe and suitable access to the site for all users; any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach. At the same time, paragraph 61 requires local plans to “significantly boost the supply of homes”. These potentially competing imperatives must be balanced, and the Framework is clear (paragraph 3) that it should be read as a whole.

Flood Risk Areas

- 6.4. The Strategic Flood Risk Assessment update (2024) confirms that large areas of Canvey Island fall within Flood Zones 2 & 3, reducing the suitability of land for housing. The Environment Agency (EA) also requires there to be a 19m buffer from sea defences, which further limits the developable area.

Environmental Designations

- 6.5. Areas of ecological importance in Castle Point, including Benfleet and Southend Marshes Special Protection Area (SPA) and Ramsar site, 6 Sites of Special Scientific Interest (SSSIs), numerous ancient woodlands, 41 local wildlife sites and 7 local geological sites. The Essex Local Nature Recovery Strategy, May 2025 produced by Essex County Council has also identified additional areas of particular importance for biodiversity (APIBs) that need to be protected with strategic opportunities within the Green Belt that creates a more connected and biodiverse natural environment. These, further constrain development.

Landscape Sensitivity

- 6.6. A Landscape Sensitivity Assessment has been completed for those sites included in the Issues and Options Document (a total of 15 sites within the Green Belt). This indicates that some sites are more sensitive to development than others. Whilst this constraint alone does not provide a strong reason for resisting development, when overlaid with other constraints may impact on decision making.

Heritage Assets

- 6.7. Multiple Heritage Impact Assessments have been completed for specific sites that have been promoted for development in the Green Belt. These have identified potential impacts to heritage assets and their settings, as a result of development.

Infrastructure Deficiencies

- 6.8. A Transport Assessment has been undertaken to understand the impact of proposed growth in the CP Plan (urban growth only) on the transport network. The South Essex Transport Model has been used. Growth in the other districts has been factored into the reference case and into testing the CP Plan proposals.
- 6.9. The work shows that at 2043:
- Journey times in peak hours will be twice the journey time of that can occur at free flow on the A13, the A127 and the A130 Canvey Way.
 - Queue lengths will worsen significantly at Tarpots, Sadlers Farm and Waterside Farm junctions.
 - Canvey Way will be operating at over 100% capacity at peak times, and journey times will be 3 minutes longer in the morning peak and 2 minutes longer in the evening peak.
 - The following other routes will also be at or over 100% capacity:
 - A13 around Sadlers Farm
 - A13 in Hadleigh
 - Long Road
 - A129 both north bound and south bound

- 6.10. Mode shift to sustainable travel is not expected to significantly reduce the impacts. Growth above the CP Plan (urban growth only) scenario will therefore worsen this situation further.
- 6.11. A site level sustainability and accessibility assessment has been commissioned to consistently and robustly assess the sustainability of each Green Belt site's location on the transport network, and to determine through highway design if the site can be accessed by all users in a safe way, considering national design requirements. This has identified a number of sites within the Green Belt cannot provide safe, suitable and sustainable access.
- 6.12. Local services (hospitals, GP surgeries, and schools) are already under pressure, and additional housing would place further unsustainable pressure on these facilities.

Overall Findings

- 6.13. 53% of the borough area is covered by Green Belt. The council's strategy focuses on delivering housing through urban renewal and regeneration, seeking to identify development sites in sustainable locations which make the best use of brownfield land. The council recognises that a shortfall in housing supply could arise as a result of not meeting the SM figure, and will continue work with neighbouring authorities under the duty to cooperate to ensure a sustainable approach to regional housing needs. Castle Point has requested assistance from neighbouring authorities to help in meeting housing need. None of the authorities are able to assist. It is recognised that all of the neighbouring authorities and members of the South Essex Councils have their own specific constraints that limit ability to accommodate additional housing needs due to a combination of factors including Green Belt, environmental protection, areas of ecological significance, limited available land within urban areas and strong local opposition.
- 6.14. The Council has exhaustively explored every reasonable alternative sources of land tested against the Green Belt Review, SFRA, LNRS, Landscape Sensitivity Assessment, Site Accessibility and Suitability, Heritage Impact Assessments and the borough-wide Transport Assessment. This rigorous process means the sites proposed for allocation in the Plan represent the maximum amount of land that can be released for housing without causing unacceptable harm to flood safety, biodiversity, landscape character, heritage assets or the strategic road network. Releasing any further Green Belt land would breach one or more of those constraints and is therefore neither justified nor sound under the December 2024 NPPF. This is set out in further detail in the Housing Capacity Topic Paper.

7. Housing Supply

Comparison with recent delivery rates

- 7.1. The housing supply: net additional dwellings statistics, also known as 'net additions', measure the change in stock between one year and the next, including losses and gains from new builds, conversions, changes of use (for example a residential house to an office) and demolitions. Net additions are comprised of 'new build completions' plus 'conversions' plus 'change of use' plus 'other net gains' minus 'demolitions'.
- 7.2. The Council has considered how the proposed rates of housing provision compare with recent rates of delivery. Table 1 below illustrates that over the past ten years, since 1 April 2015, 990 dwellings have been delivered, averaging 99 per annum within the Castle Point plan area. This contrasts with an identified housing need of 686 dwellings per annum under the December 2024 revised standard methodology. This serves to underline the difficulty in meeting such high delivery rates in the Borough.

Table 1: Housing Completions in Castle Point 2015/16 to 2024/25

Monitoring Year	Number of homes delivered (net additional dwellings)
2015/16	88
2016/17	84
2017/18	133
2018/19	173
2019/20	44
2020/21	144
2021/22	205
2022/23	156
2023/24	-58
2024/25	21
Total	990
Annual Average	99

Components of the supply

- 7.3. The Regulation 19 Draft Plan approach is based on the housing land supply position as of 1 April 2025. This reflects the most up-to-date position available at the time of submission.

- 7.4. The overall housing supply position is set out in Table 2 below. A more detailed overview of the components of the supply is shown in the trajectory and referenced in the following section.

Table 2: Housing Supply as 1 April 2025

Category	Number of dwellings	%
Committed sites with outstanding planning permission on both large and small site as at April 2025	480	7.8
Thorney Bay	173	2.8
Canvey Urban Sites proposed allocations and Broad Locations (Policies C1, C4, C9 and C10)	3,143	51.0
Benfleet Urban Sites proposed allocations and Broad Location (Policies B3, B5, B6, B7 and B8)	428	6.9
Hadleigh Urban Sites proposed allocation and Broad Locations (Policies Had1, Had3 and Had4)	516	8.3
Thundersley Urban Site proposed allocations	781	12.6
Windfall (small site allowance) @ 45 dwellings per annum	675	10.9
Total supply for the full Plan period (1 April 2025 to 31 March 2043)	6,196	100

- 7.5. The supply provides for a total of 6,196 dwellings during 2026-2043.

Existing commitments

- 7.6. Sites which already have existing planning permissions for housing will also contribute to the overall housing supply. On 31 March 2025 there were 480 dwellings constituting about 8% of the total supply that had planning permission or prior approval for permitted development. These sites are included within the housing trajectory (including phasing of major sites) at Appendix 2.

Windfall Allowance

- 7.7. The NPPF paragraph 75 sets out that an allowance for windfall can be made as part of anticipated supply. A windfall site is a site not specifically identified in the development plan. There is no set methodology on how to calculate a windfall allowance, however it must be realistic having regard to the SLAA, historic windfall delivery rates and expected future trends.

- 7.8. For plan making, Castle Point define a windfall sites as a site not identified in the development plan, that delivers 5 dwellings or less..
- 7.9. Assessing past contributions from windfall sites in Castle Point, has demonstrated an average of 46 dwellings per annum have been delivered over the last 10 years.. This is set out in table 3 below.

Table 3: Historic Windfall Delivery 2013/14 to 2024/25

Year	Completions
2015/16	49
2016/17	55
2017/18	53
2018/19	62
2019/20	60
2020/21	66
2021/22	28
2022/23	48
2023/24	26
2024/25	15
Total	462
Annual Average	46

- 7.10 As a result, a windfall allowance of 45 new homes a year from 2028/29 (year 3) in the plan period is considered a robust and justified contribution to the overall housing supply; 675 homes are anticipated to be delivered through windfall sites by 2043.

Allocations in the Castle Point Plan

- 7.11. The additional sites proposed for allocation were identified through the SLAA, which forms part of the evidence base for the Castle Point Plan. The SLAA provides an initial assessment of the suitability, deliverability, availability and achievability of sites. It does not make recommendations as to whether a site should be allocated or not, rather it is one of several pieces of evidence which together inform the spatial strategy for the Castle Point Plan.
- 7.12. The new sites allocated within the Regulation 19 draft Castle Point Plan are included within the housing trajectory (including phasing of sites) Appendix 2.
- 7.13. Together with existing commitments, windfall allowance and proposed new allocations this should provide for a rolling 5 years of specific deliverable sites (based upon an annual average requirement of 364 new homes per annum) and sufficient specific developable sites or broad locations for growth for years 6 – 10 and years 11 to 17, thus meeting the requirements of paragraph 72 NPPF, 2024.

Small Sites

- 7.14. The NPPF identifies the important contribution that small and medium sized sites can make to meeting the housing requirement for an area and sets the

requirement that development plans and brownfield registers should identify land to accommodate at least 10% of the housing requirement on sites no larger than 1 hectare, unless it can be demonstrated through plan preparation that there are strong reasons why this cannot be achieved (para 73).

- 7.15. Table 4 below, identifies the sites that are allocated in the Regulation 19 draft Castle Point Plan that are no larger than 1 hectare.

Table 4: Sites allocated in the emerging Castle Point Plan that are no larger than 1 hectare

Policy Reference	Site name	Site size Ha	Number of Dwellings
Had 1	Osbourne Motor Co	0.072	11
Had 3	Hadleigh Clinic	0.093	12
Can 1	Kushi	0.093	14
Can 1	Matrix House	0.095	15
Can 10	Admiral Jellicoe	0.106	13
Can 10	Corner of Little Gypps Road and Willow Close	0.107	11
Can 10	Essex Coach Works	0.121	12
Can 1	Canvey Job Centre	0.13	20
Ben 7	Thames Loose Leaf	0.178	22
Can 10	Land between Station Road and Seaview Road	0.189	19
Thun 3	Thundersley Clinic	0.19	24
Can 1	Former Barclays Site	0.19	29
Ben 7	Queen Bee's Nursery	0.224	28
Can 1	Grouts Canvey	0.229	72
Had 1	Castle Lane Car Park	0.317	48
Ben 3	Former Furniture Kingdom Site	0.321	48
Can 10	Outpatients Centre Long	0.322	40

Policy Reference	Site name	Site size Ha	Number of Dwellings
	Road, Former Council Office		
Can 1	Oak Road Car Park	0.348	61
Can 1	Furtherwick Road	0.29	44
Had 1	Johnsons Factory	0.375	56
Ben 7	Richmond Car Park	0.391	27
Ben 7	Land Adjacent to Villa Park	0.145	10
Ben 6	159-169 Church Road	0.402	60
Can 10	Rear of North Avenue	0.404	51
Can 10	Ozonias Gardens	0.171	17
Can 1	Stafford Court Care Home	0.553	80
Had 1	The Island Site	0.628	74
Ben 5	Canvey Supply	0.644	81
Total	28	7	999

8. Housing Delivery and Trajectory

- 8.1. Paragraph 78 of the NPPF states that *“strategic policies should include a housing trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites”*.
- 8.2. In line with Policy SP3 (Meeting Development Needs) the focus is on early urban brownfield development initially, and strategic broad locations later in the plan period..
- 8.3. The expected delivery rate for each of the strategic broad locations and allocated sites is set out in the housing trajectory taking into account the anticipated lead-in times for each site, together with anticipated annual delivery. These have been informed by evidence from the Strategic Land Availability Assessment and liaison with site promoter and developers over time.
- 8.4. The Council considers the information on delivery provided by the landowner / developer as the most robust source and uses this as the starting point for considering what might reasonably be delivered within the plan period. Where necessary, the Council has adjusted the projected delivery to take account of any overly optimistic view, ensuring that the figures relied on by the Council within the first five year period are realistic. The Council has also used local knowledge of the specific site and proposed development and given consideration to likely lead in times and build out rates on different type of sites.
- 8.5. In respect of small unallocated sites with planning permission (sites of 9 dwellings or less), these have not been assessed for deliverability in the same manner as large and medium sites, however the definition of 'deliverable' is clear that sites that are not major development should be considered deliverable until permission expires.
- 8.6. To further support housing delivery, the council will:
 - Maintain a Brownfield Register to identify suitable sites.
 - Develop master plans for Canvey and Hadleigh town centres and Kiln Road Campus integrating housing within a mixed use development.
 - Support the renewal of designated employment sites for Manor Trading Estate and West Canvey through master plan to provide mixed-use developments.
- 8.7. The indicative capacity has been determined based on the available information for each site. Where a site has planning permission the number of dwellings to be delivered reflects what has been approved This represents a realistic assessment of the amount of housing the site is likely to deliver upon implementation of the permission.

8.8. Where new allocations have no planning permission or information from a site promoter an indicative capacity based on a standard site density assumptions has been applied. To inform this a Castle Point Density and Capacity Study has been undertaken to understand what density could be appropriate for different sites. Site capacities in the Study were derived using a capacity-led approach that reflects national policy, design guidance, and site-specific constraints. Sites were categorised by typology (urban, edge-of-settlement, and greenfield), with indicative density ranges applied accordingly. Assumptions on net developable areas accounted for physical limitations and layout considerations, with final yields calculated by applying appropriate densities to these adjusted areas. The methodology ensures realistic, context-sensitive estimates of development potential. Full details are available in the Castle Point Density and Capacity Study (July 2025).

Phasing

8.9. Once the indicative capacity has been established for each site, the anticipated timescale for the delivery must be considered to inform the phasing of sites and the housing trajectory. Assumptions which affect the phasing of sites include the lead-in time, build rates, proximity of other sites and site constraints to determine the period for delivery. The approach taken in considering each of these factors is outlined below.

Lead-in times

- 8.10. The third edition of Lichfield’s *Start to Finish* report, published in March 2024, provides an in-depth analysis of housing delivery timelines across England and Wales. Assessing 297 sites totalling 387,000 dwellings—including 179 sites with 500 or more units. The assessment of lead in periods for first delivery on sites in the trajectory has been informed by these research findings.
- 8.11. The report highlights significant variations in lead-in times based on site size. These timelines underscore the extended durations involved in bringing larger housing developments to fruition, emphasizing the need for realistic planning and policy frameworks more detailed breakdown of lead-in times from planning application submission to first dwelling completion, categorized by site size is shown in the table 5 below.

Table 5: Application to completion of the first dwelling - Lichfield's' Start to Finish, March 2024

Site Size (Number of Dwellings)	Average Time to First Completion	Notes
<100 units	~3.8 years	Typically deliver within 5 years from planning application validation.
100–499 units	Approximately 4–5 years	Slightly longer lead-in times due to increased complexity.

500–999 units	Approximately 5–6 years	Extended planning and pre-commencement phases beyond 5 years.
1,000–1,999 units	~6.3 years	Includes time for obtaining planning permission and initial delivery.
2,000+ units	~8 years	Average of 5 years to obtain planning permission, plus 1.3 to 1.6 years to first dwelling completion.

8.12. The report highlights significant variations in lead-in times based on site size:

- **Smaller Sites (<100 units):** These sites generally progress more swiftly through the planning system, often delivering the first dwelling within approximately 3.8 years from application validation.
- **Larger Sites (>1,000 units):** These developments typically experience extended lead-in times, averaging around 6.3 years for 1,000–1,999 units and up to 8 years for sites with 2,000 or more units. The extended timelines are due to the complexities involved in planning, obtaining permissions, and initial site work

8.13. These timelines underscore the extended durations involved in bringing larger housing developments to fruition, emphasizing the need for realistic planning and policy frameworks.

8.14. The lead-in times are affected by various factors, including site size, complexity of planning issues, and the need for comprehensive master planning and infrastructure delivery.

Castle Point Plan Trajectory

8.15. The housing requirement set out in Policy SP3 is proposed to be delivered via a stepped housing trajectory at a minimum of 209 new homes per year for the years 2026-31 (years 1 to 5), increasing to 253 new homes per year for 2031-2036 (years 6-10) and at least 554 homes per year from 2036-43 (years 11 to 17). This reflects the phased delivery of available sites at the time this plan was prepared, and the current point sites are within the planning process.

9. Affordable Housing

- 9.1. Annex 2 of the NPPF 2024 defines affordable housing as: “homes for rent or sale for people whose needs aren't met by the market; (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

A) **Social Rent:** meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent; (b) the landlord is a registered provider; and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision.

B) **Other affordable housing for rent:** meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).

C) **Discounted market sales housing** is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.

D) **Other affordable routes to home ownership:** is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.

- 9.2. Planning policies must require on-site affordable housing—specifying the share of Social Rent—unless a well-justified alternative (off-site units or cash) still supports mixed, balanced communities (NPPF, Para' 64).
- 9.3. The council recognises that housing affordability is a key issue for local residents. House prices in Castle Point have risen significantly in recent years with an affordability ration of 11.43 in 2023, but has come down to 9.31 in 2024 - making home ownership difficult for many first-time buyers. The council will explore innovative solutions, such as community-led housing schemes, partnerships with housing associations, and the use of public land for affordable housing developments.

The Supply of Affordable Housing

- 9.4. The NPPF requires local authorities to assess the need for affordable housing, and then to specify in planning policies the amount and type of affordable housing which needs to be provided. This is covered under Policy Hou2 (Securing More Affordable Housing) of the Castle Point Plan.
- 9.5. Paragraph 65 of the NPPF states that local authorities should not require affordable housing to be provided on sites that are not major developments (10+ homes) other than in designated rural areas where policies may set a lower threshold of 5 units or fewer.
- 9.6. In line with the NPPF, the PPG (Paragraph: 023 Reference ID: 23b-023-20190901) clarifies: "Planning Obligations also sets out the restrictions on local authorities in requiring affordable housing to be provided on small sites. It advises that affordable housing should only be sought on major residential developments (defined as 10 or more homes or a site area of 0.5 hectares or more). The PPG advises however that in designated rural areas local planning authorities may instead choose to set their own lower threshold in plans and seek affordable housing contributions from developments above that threshold. Designated rural areas applies to rural areas described under section 157(1) of the Housing Act 1985, which includes National Parks and Areas of Outstanding Natural Beauty".
- 9.7. As of the latest available information, there are no areas within the Borough of Castle Point designated as "rural areas" under section 157(1) of the Housing Act 1985. This section allows the Secretary of State to designate certain area rural, thereby imposing restrictions on the resale of former council houses to preserve affordable housing for local residents. The Housing (Right to Acquire or Enfranchise) (Designated Rural Areas in the East) Order 1997 lists specific parishes and areas in Essex that have been designated as rural. While this order includes several areas in Essex, it does not designate areas within the Castle Point borough area.
- 9.8. In terms of calculating the need for affordable housing the PPG: Addressing the need for different types of housing (Paragraph: 006 Reference ID: 67-006 20190722); and also in: Housing and economic needs assessment (Paragraph: 020 Reference ID: 2a-020-20190220) advise that data should be collected on the number of homeless households, the number in priority need who are in temporary accommodation, the number in over-crowded housing, the number of concealed households, the number of existing affordable tenants housed in unsuitable homes, and the number of households from other tenures in need and those that cannot afford their own homes, either to rent, or to own, where that is their aspiration.
- 9.9. In assessing the total affordable housing supply the PPG (Paragraph: 022 Reference ID: 2a-022-20190220) advises that the following will need to be identified:
- The number of currently occupied affordable homes soon to be vacated and reusable;
 - Vacant, suitable surplus stock; and

- The committed pipeline of new net affordable homes (by number and size)

9.10. To understand how many affordable homes are needed each year, you start by calculating the total need for affordable housing. From this, subtract the number of affordable homes already available. Then, divide the remaining number (the net need) by the number of years in the plan to get an annual target. Next, look at how much affordable housing is likely to be built as part of new developments that also include market (for sale or rent) homes.

The Current Context

9.11. In Castle Point Borough, developers are generally expected to provide 35% affordable housing from all proposals for major residential development, and mixed use proposals that include an element of housing, resulting in 10 or more net additional homes. This requirement is detailed in the council's [Affordable Housing Developer Contributions Supplementary Planning Document \(SPD\) 2023](#), which outlines how affordable housing should be integrated into new projects.

9.12. As demonstrated within this SPD there is an identified need for affordable housing within the borough. Evidence collected in the withdrawn Castle Point Local Plan 2018 – 2033 (CIL Viability Study 2020) found that the 35% requirement is acceptable in most cases.

9.13. It's important to note that these policies are subject to change, until adoption of the new Castle Point Plan. Developers and stakeholders should consult the most recent planning documents and engage with the council to understand current requirements.

Local Housing Need Assessment

9.14. In 2023 Opinion Research Services (ORS) were commissioned by the Council to prepare a Local Housing Needs Assessment (LHNA). It considered the needs of the Authority for the period 2023-2043 to identify the size, type and tenure of homes that would be needed in the future, and the housing needs of different groups, including affordable housing. This was published in December 2023 and provides a detailed assessment of housing affordability in Castle Point by looking at local housing costs and incomes. It also provides an assessment of the annual need for affordable homes based upon the PPG as set out above in paragraphs 9.9 - 9.11. This was reviewed and updated as set out in the Local Housing Needs Assessment Update (LHNA) June 2025. The evidence shows that housing affordability remains a key issue in Castle Point.

9.15. The analysis in the most up to date evidence follows the PPG (Sections 2a-018 to 2a-024) and provides two main outputs, linked to Annex 2 of the NPPF. The Local Housing Needs Assessment Update 2025 identifies a total constrained housing requirement of 5,950 dwellings (350 per annum) for 2026-2043, of which 1,458 new homes need to be affordable. This equates to 86 affordable homes p.a. across the plan period, or about 24% of the total supply. The Council's target is to deliver this quantum of affordable housing. The updated figures in Table 37 of the report, show

a need for 1,009 as social rent, 69 for affordable rent and 380 need for affordable home ownership. First Homes and shared-ownership products remain acceptable for meeting the 10 % affordable-ownership floor.

- 9.16. Developments of fewer than 10 new homes are not expected to deliver any affordable housing, in line with national guidance. Small-site development (windfall sites of five or fewer dwellings and sites of six-to-nine dwellings) still accounts for 18 % of new supply (2027-2043) and will not contribute to affordable housing.
- 9.17. The LHNAU, 2025 continues to show an overwhelming need for social-rent homes alongside a smaller but important need for affordable homes to buy. First Homes and shared-ownership products remain acceptable for meeting the 10 % affordable-ownership floor.

Viability

- 9.18. The impact of requiring the provision of affordable housing on the viability of schemes has been tested. The proposed thresholds for affordable housing in Policy Hou3 are supported by the findings and recommendations of the Castle Point Plan Viability Study (July 2025). The affordable-housing requirements are deliverable across almost all site types and value areas. The only pressure arises on high-density flatted brownfield schemes that incorporate commercial ground-floor space. For these schemes, the appraisal evidence shows that a full 10 % affordable-home-ownership requirement could make some proposals unviable. In such circumstances the Council will exercise flexibility, to be agreed on a case-by-case basis through an open-book viability review, in order to secure a level of affordable-homeownership that the scheme can reasonably support while still contributing to borough-wide housing objectives. A meaningful share of the allocated sites are within public ownership, giving the Council scope to negotiate land values and, where viable, push affordable-housing delivery above the policy minimum through grant funding or other flexibilities available to public-sector landowners.

Castle Point Plan Policy Hou2 – Securing More Affordable Housing

- 9.19. The proposed affordable housing policy requirement in the Castle Point Plan is different from that which is currently used as contained in the adopted Affordable Housing Developer Contributions SPD, 2023. In accordance with national policy and the latest evidence the Council will expect developers to provide 20% affordable housing on previously developed land and 30% on greenfield land on all major proposals defined as 10 or more dwellings. On brownfield land the tenure requirement will be for 10% affordable ownership and 10% for social rent. On greenfield sites the requirement is for 10% affordable ownership and 20% social rent. This requirement is summarised in the table 6 below:

Table 6: Affordable Housing requirements proposed in Regulation 19 Castle Point Plan

Tenure split	Urban brownfield residential only	Urban brownfield with commercial ground floor	Urban greenfield sites	Grey belt / Green Belt Release sites
Affordable Home Ownership	10 %	10 %	10 %	25 %
Social Rent	10 %	–	20 %	25 %
Total affordable Requirement	20 %	10 %	30 %	50 %

Percentages are expressed as a share of the total dwellings on each qualifying site (≥ 10 homes or ≥ 0.5 ha).

- 9.20. However, under paragraph 67 the 2024 NPPF as part of the ‘Golden Rules’ for Green Belt development set out in paragraphs 156-157 of the Framework, a specific affordable housing requirement (or requirements) should:
- be set at a higher level than that which would otherwise apply to land which is not within or proposed to be released from the Green Belt; and
 - require at least 50% of the housing to be affordable, unless this would make the development of these sites unviable (when tested in accordance with national planning practice guidance on viability).
- 9.21. The December 2024 revision of the NPPF removed the mandatory requirement for local plans to include First Homes.
- 9.22. Additionally, First Homes have been removed from the NPPF's definition of affordable housing in Annex 2, along with Starter Homes. This change grants local planning authorities greater flexibility to determine the most appropriate affordable housing tenures for their communities, with a renewed emphasis on delivering more genuinely affordable options like Social Rent.
- 9.23. While First Homes remain a viable option for delivering affordable housing, they are no longer a national policy requirement. Local authorities may choose to include First Homes in their plans if they align with local housing needs, but there is no obligation to do so.
- 9.24. The affordable housing policy Hou2 and proposed tenure split is supported by analysis of the evidence. It provides a clear justification for securing social rent as the preferred tenure in negotiations.

10. Housing Type and Mix

- 10.1. Paragraphs 20 and 61-67 of the NPPF require strategic policies to set out “*an overall strategy for the pattern, scale and design quality of places*” and be “*informed by a local housing-needs assessment*”, providing “*an appropriate mix of size, type and tenure*” for all groups in the community. Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes.
- 10.2. The PPG includes a section on ‘the housing needs of different groups’ which provides guidance on how the housing needs of various groups can be assessed. The Housing & economic needs assessment PPG (ID 2a) pars 018-024 set out the method for disaggregating the overall housing need into size, type and tenure strands. Par 040 confirms that the resulting mix “*should inform policies on the size, type and tenure of housing*”.
- 10.3. The PPG – Housing needs of different groups (ID 67-001-009) - Requires plans to consider the needs of families, older people, students, people with disabilities, renters, self-builders and travellers, and to ensure policies will deliver suitable accommodation.
- 10.4. Policy Hou3 in the Regulation 19 Castle Point Plan translates these national expectations into locally evidenced size-and-tenure targets. In terms of the housing stock in the borough 81% of Castle Point homes are detached or semi-detached and only 9 % are flats (ONS Census 2021), a proportion less than half the England average (22 %). In contrast, 1- and 2-person households account for 64 % of occupied households. South Essex Housing Market Trends, Quarterly Report market analysis, 2025 shows that this scarcity pushes local flat prices roughly 15 % above the wider South Essex benchmark. Allocating a higher proportion of well-located flats will widen choice for first-time buyers and give older households downsizing options that in turn release larger homes for families.
- 10.5. The housing needs of the various community groups and the emerging population trends and demographics have been assessed through the LHNA 2023 and the subsequent 2025 Update. This evidence has established the mix of new homes required which has been taken into account in Policy Hou3. To meet the projected local housing needs for Castle Point, the assessment set out the dwelling size, household type and tenures that are required to be built over the plan period.
- 10.6. The assessment of the evidence concludes that the following represents an appropriate mix of affordable and market homes. The policy table (mix by size/tenure/area) remains valid and reflects both the LHNA’s findings and the borough’s strategic objectives.

The methodology also takes account of established or emerging design code areas, ensuring density assumptions align with intended design character, layout, and policy requirements.

Table 7: Housing mix by size in affordable and market sectors

Unit Size	Premium Sustainability Areas		All Other Areas	
	Market	Affordable	Market	Affordable
1 bed	15%	40%	0%	10%
2 bed	60%	40%	35%	35%
3 bed	25%	20%	45%	40%
4+beds	0%	0%	20%	15%

- 10.7. The size-and-tenure percentages in the Hou3 Policy table flow directly from national policy tests and the recent demographic evidence (Castle Point LHNA 2023 and Update 2025), and the spatial strategy that concentrates higher-density development in Premium Sustainability Areas (PSAs) – i.e. land within an easy walk of town-centre services and high-frequency public-transport nodes (Policy D2).
- 10.8. Policy Hou3 secures a strong supply of 1- and 2-bed flats in PSAs (supporting downsizers and younger households) while still requiring 3- and 4-bed houses in suburban areas to meet family need. The 2025 LHNA update shows > 50 % of new affordable dwellings should be 1- or 2-bed to release concealed households and meet younger-adult need; viability testing confirms that a 40 % quota of 1-beds in PSAs is deliverable. Locating smaller, lower-parking-demand homes in PSAs supports mode shift, underpins bus patronage and boosts footfall for town-centre regeneration supporting other objectives of the Castle Point Plan.
- 10.9. Policy Hou3 sets the initial benchmark; It is recognized that there may be cases where site-specific factors, such as abnormal costs, design constraints, specialist accommodation may justify a different mix, consistent with PPG 2a-024. This will be considered on a case by case site assessment basis.
- 10.10. Policy Hou3 type and mix provides proportionate and NPPF-compliant basis for development-management decisions over the plan period.

11. Specialist Housing

- 11.1. Between 2025 and 2043, Castle Point is expected to see modest population growth, with the total population projected to rise from approximately 89,600 in 2021 to around 96,000 by 2043—an increase of about 7% (Active Essex Insight Pack, 2024). The most significant demographic shift during this period is the sharp rise in the number of residents aged 65 and over. By 2043, people aged 65+ are expected to make up 28.6% of the population, up from around 22% in 2021, reflecting a clear ageing trend and increasing dependency ratio (ONS-based projections as summarised in the Active Essex report and ONS 2018-based subnational population projections).
- 11.2. This demographic change will have important implications for local planning. Demand is likely to grow for age-appropriate housing, health and social care services, and mobility support. At the same time, smaller household sizes—common among older adults—may drive household growth that exceeds the rate of population growth. To address these trends, Policy Hou4 supports healthy ageing and aims to deliver appropriate housing and services for an increasingly elderly population.
- 11.3. Specialist accommodation can include many different types of accommodation that caters for people's specific needs. Specialist housing covers housing for older, or disabled people and can include supported housing or where access to support is provided if required.
- 11.4. As the Borough plans for future housing growth, it is essential to ensure that the housing stock is inclusive, accessible, and capable of meeting a diverse range of needs—including those of older people, disabled residents, vulnerable adults, and families with specific support requirements.
- 11.5. The LHNA (2023) and the Essex Supported and Specialist Housing Needs Assessment (Housing LIN, May 2025) provide the evidence base for quantifying these needs. Policy Hou4 translates these needs into clear, deliverable policy requirements and targets.
- 11.6. The objective of policies is to provide homes which are accessible and adaptable so people can stay living in their own homes for as long as they wish. Housing for adults with care needs and older people can fall within the planning use class of C2 or C3 (dwelling house). Use class C2 residential institutions all have an element of care, and residential care homes or nursing homes fall within this category.
- 11.7. A requirement that 100% of new homes meet M4(2) standards ensures that new dwellings are suitable for a broader demographic and can adapt over time to meet residents' needs without costly retrofitting. These homes support ageing in place and long-term independent living.
- 11.8. Category M4(2), also known as the “accessible and adaptable” standard, ensures that new homes are suitable for a wider range of people—including older and disabled residents—by incorporating features such as step-free access, wider doorways, accessible bathrooms, and reinforced walls for future adaptations. The

Government has confirmed its intention to make Part M4(2) of the Building Regulations—the accessible and adaptable standard—the new mandatory minimum for all new homes in England, replacing the current default of M4(1) (visitable dwellings). This change aims to improve the accessibility of housing in response to an ageing population and rising mobility needs. While the policy decision was announced in 2022, the Government is still working through technical consultations and legislative updates. As of now, no fixed implementation date has been confirmed.

11.9. Based on the evidence, consultation responses, the government’s proposal to make all M4(2) standards mandatory and the significant projected increase in the number of elderly residents, Policy Hou4 require all housing development to meet M4(2) standards.

11.10. There is an unmet need for around 130 fully wheelchair-accessible homes now, rising to 158 by 2044. The policy’s 10% requirement for M4(3) homes is modest yet effective, reflecting both projected demand and development feasibility, unless evidence clearly demonstrates that this would make the scheme unviable.

11.11. The ageing demographics in Castle Point underpins the need for a more diverse range of housing options, especially for older residents seeking to downsize or access care.

Provision Targets:

- 1,056 retirement/sheltered units
- 594 extra care units

These targets align with the Essex-wide assessment and account for both current shortfalls and projected demand.

11.12. The provision of a choice of attractive housing options to older households is a component of achieving good housing mix. The availability of such housing options for the growing older population may enable some older households to downsize from homes which no longer meet their housing needs and also help in releasing larger family homes into the wider housing market.

11.13. The Essex Supported and Specialist Housing Needs Assessment (Housing LIN, May 2025) identifies that by 2044, Castle Point will have a need for 138 residential care beds and 139 nursing care beds.

11.14. The Essex Report identifies a persistent need for supported housing for working-aged adults with care or support needs. In response Policy Hou4 supports this need and ensures provision is well-located—close to shops, services, and transport. It also incorporates an “Essex-first” condition to prioritise local placements, helping families stay connected.

11.15. Policy Hou4 reflects needs assessments and aligns with both local priorities and national planning expectations. It:

- Promotes housing that is accessible and fit for all life stages.
- Helps meet growing demand from an ageing population.

- Enables vulnerable adults and children to be supported in their own community.
- Reflects local evidence while remaining realistic and deliverable.

11.16. As such, it is a key component of contributing to achieving mixed and balanced communities, which supports the changing needs of individuals and families at different stages of life, including those with disability and a long-term health problems.

12. Self and Custom Build

- 12.1. Castle Point Borough Council complies with the Self-Build and Custom Housebuilding Act 2015 (as amended by the 2016 Housing and Planning Act), including maintenance of a local register for individuals and associations seeking serviced plots. The Council is required to grant sufficient development permissions for serviced plots to meet the level of demand recorded on the register within three years of each base period.
- 12.2. The Local Housing Needs Assessment (ORS, 2023) provides the following key findings:
- As of October 2022, Castle Point had not permitted any plots specifically recorded as self or custom build, despite low but consistent interest on its statutory register.
 - The number of new applicants per year has varied (e.g., 6 in 2018–2019, 7 in 2019–2020, 5 in 2020–2021 and 3 in 2023–24)
- 12.3. Between October 2023 and October 2024, 11 serviced plots for self and custom build were granted.
- 12.4. Policy Hou4 is justified in supporting self and custom build housing delivery where a need is identified. While current register numbers are low, the evidence confirms latent market demand and slow delivery of plots. The policy therefore aim to:
- Enable provision on suitable sites;
 - Secure plots as part of larger developments;
 - Prioritise delivery models that support lower-cost and partially completed custom homes;
 - Use the Self and Custom Build Register as a starting point, but not the sole measure, for assessing local demand

13. Gypsy and Traveller Accommodation

- 13.1. The Gypsy and Traveller Accommodation Assessment, 2024 provides robust evidence of the current and future need for Gypsy, Traveller and Travelling Show People accommodation in the Castle Point Borough Council area. Since publication of this report there have been some changes to the Planning Policy for Traveller Sites (PPTS), following the NPPF update in December 2024.
- 13.2 The main implication of the changes are that all Gypsies and Travellers will now meet the 2024 PPTS planning definition of a Traveller and that 100% of any previously undetermined need will need to be addressed. This however does not impact the validity of the study with regards to the amount of need identified within the Borough, rather just the how the authority deals with meeting that identified need. Figure 1 of the GTAA report includes a table demonstrating the Need for Gypsy and Traveller households in Castle Point (2024 – 2042). Below is the updated table in accordance with the amended PPTS.

Table 8: – Need for Gypsy and Traveller households in Castle Point (2024 – 2042)

Status	2024 – 2042
Meet Planning Definition [Gypsy and Traveller Policy Allocations]	15
Undetermined [meet 100% of this need through Criteria-Based Policies]	3
TOTAL	18

- 13.3. As Castle Point did not have any requirement for households that did not meet the 2023 planning definition this has no implications for the overall number of pitches provided for within the Castle Point Plan.

14. Conclusion

- 14.1. To achieve the standard methodology figure of 686 dwelling per annum (11,662 over the plan period 2026-2043) as required in the current revised NPPF, would require large scale Green Belt land releases.
- 14.2. Castle Point is predominantly urbanised, with limited brownfield land available for development. The extensive evidence base prepared to support the Castle Point Plan, including but not limited to the Green Belt Assessment, Heritage Impact Assessments, Strategic Flood Risk Assessment, Site Access and Suitability Assessment, Transport Assessment and the Essex Local Nature Recovery Strategy, demonstrate that development of 686 homes per annum cannot be achieved without leading to overdevelopment, loss of character, and infrastructure strain. In accordance with the NPPF (which must be read as a whole), the Castle Point Plan aims to make effective and optimal use of land, by increasing densities within the borough's existing settlements. However this needs to be reasonable so as not to conflict with local design policies and harm the character and amenity of established neighbourhoods leading to:
- Overdevelopment of urban areas affecting quality of life;
 - Loss of local character and amenity;
 - Significant pressure on existing infrastructure and services
- 14.3. The above reinforces the need for a lower, locally justified housing requirement and supports a strategy of:
- Prioritising urban intensification
 - Maximising sustainable brownfield opportunities
 - Minimising harm to the Green Belt and valued landscapes
- 14.4. An urban-first approach, grounded in clear evidence and local constraints, offers a deliverable and defensible spatial strategy for the Castle Point Plan.

Unrealistic Housing Delivery Rates

- 14.5. The borough has never delivered housing at a rate close to 686 dwellings per annum. Over the past 10 years, Castle Point has delivered an average of fewer than 200 dwellings per annum, highlighting the gap between the standard methodology figure and what is realistically achievable. There is no market evidence to suggest that the local housing market could absorb 686 homes per year without significant market saturation, price suppression, and viability concerns.

Lower Housing Target

- 14.6. The PPG¹ -Housing and economic needs assessment (Paragraph: 040) states that once a LHN figure has been established authorities should then make an assessment of the amount of new homes that can be provided for in their area. This should be justified by evidence on land availability, constraints on development and any other

relevant matters. This therefore allows local authorities to depart from the unconstrained standard methodology where there are severe constraints.

- 14.7. Given existing local constraints, including Green Belt coverage (53% of the borough), environmental constraints and local infrastructure capacity, with none of the neighbouring authorities able to assist in meeting unmet housing need the council will not be able to meet the unconstrained need calculated using the standard methodology in full. A lower, locally justified housing requirement has been set in accordance with PPG on constrained authorities. The council has set a housing delivery target of 6,196 homes between 2026 and 2043 with a phased approach to housing delivery over the plan period. This is outlined in Policy SP3 – Meeting Development Needs. Although this does not meet the unconstrained Standard Method need the Council aims to significantly maximise housing supply.
- 14.8. At a minimum the Plan will therefore provide for the local need for housing as identified through the Local Housing Needs Assessment 2023. The level of housing provision that this Plan will deliver reflects the size, character and capacity of the Borough, will protect the fundamental purposes and function of the Green Belt across the area, and facilitate the delivery of the green infrastructure as set out in policy SP1.
- 14.9 The Castle Point Plan adopts a strategy which focuses on brownfield sites and underutilized urban areas to meet housing needs before considering Green Belt land. Prioritizing urban regeneration over new development on protected land aligns with national planning guidance.
- 14.10. The Council will continue to explore all potential options to maximize housing delivery while ensuring development is sustainable and appropriate for the local context. The Council will continue to work collaboratively through the Duty to Cooperate and other mechanisms to address these issues effectively.
- 14.11. The housing target is therefore based upon a careful balance between maximising housing need and sustainable development which preserves the borough's environment and does not place strain on infrastructure capacity.
- 14.12. The Castle Point Plan takes a balanced approach to meeting housing needs, recognizing the borough's constraints while ensuring sustainable development. The Plan adopts an urban first strategy prioritizing brownfield redevelopment and urban intensification through the optimisation of land in the existing urban areas, to deliver much-needed housing while protecting the borough's character and environment.
- 14.14. The council will continue to monitor housing delivery and review its policies accordingly to respond to changing housing needs, market conditions, and government guidance.

Appendix 1 - Standard Method Calculation Using Proposed Formula (June 2025)

Step 1 – Setting the baseline – providing stability and certainty through housing stock

0.8% of existing housing stock

Data source: Live table 125

<https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>

2001 – 2024 Most recent housing stock in Castle Point = 39,075 net dwellings

The housing stock baseline figure is 312.6

Step 2 – Adjusting for affordability

Adjustment Factor = ((five-year average affordability ratio)-5)/5x0.95+1

Affordability ratio in Castle Point (2020 - 2024)

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian>

2020 – 11.15

2021 – 12.24

2022 – 12.29

2023 – 11.43

2024 – 9.31

The authority's 5 year average median workplace-based affordability ratio is therefore 11.28. As this is above 5 the following adjustment is made.

$$\text{Adjustment factor} = \left(\frac{\text{five year average affordability ratio} - 5}{5} \right) \times 0.95 + 1$$

Adjustment factor = (11.28-5)/5) x0.95+1=
(6.28/5) x0.95+1= 1.256x.95+1

The adjustment factor is therefore 2.193

Minimum annual local housing need figure = housing stock baseline x adjustment factor

Minimum annual local housing need figure = 312.6 x 2.193

The resulting figure is **685**

Appendix 2 – Housing Trajectory – 1 April 2025

Site Reference:	Name of Site	Capacity (Gross) at 1 April 2025	Replacements (Losses)	Justification	Start of Plan Period				5 Years					10 Years					15 Years			TOTAL
Draft Castle Point Plan - Site Allocations					2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	2041/42	2042/43	
B3	Furniture Kingdom, London Road	48		Previous application submitted. Exploring alternative options via Prior Approval			48															48
B5	Canvey Supply	81						21	20	20	20											81
B6	159-169 Church Road	40						20	20													40
B7A	Richmond Avenue Car Park	27		Site owned by CPBC, delayed delivery to ensure car park uses are provided				27														27
B7B	Land Adjacent Villa Park, Tarmarisk	10		Site owned by CPBC, will not progress all sites at once					10													10
B7C	312-320 London Rd (Queen Bee's)	22		Redevelopment of existing employment use					22													22
B8	Manor Trading Estate	200		Delay to allow for master planning and to address potential contamination issues and relocation of existing employment uses												20	40	40	50	50		200
C1	Canvey TC	820		Delay to allow time for master planning but recognising there are smaller sites within the broad area that could come forward earlier						30	50	50	50	50	50	70	70	90	90	100	120	820
C4	Land in the West of Canvey Island	2000		Delay to allow for master planning, but recognising there are multiple sites within the broad area that could come forward together										250	250	250	250	250	250	250	250	2000
C9	Land at the Point	185		Delay to allow time for master planning and relocation of existing employment uses						22	40	60	63									185
C10A	Admiral Jellico	7						7														7
C10B	Land Rear of North Avenue	28		Site owned by CPBC, will not progress all sites at once						14	14											28
C10C	Essex Coach Works	12						12														12
C10D	Former Council Offices, Long Road	48		Site owned by CPBC, will not progress all sites at once						24	24											48

Site Reference:	Name of Site	Capacity (Gross) at 1 April 2025	Replacements (Losses)	Justification	Start of Plan Period				5 Years					10 Years					15 Years			TOTAL
Draft Castle Point Plan - Site Allocations					2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	2041/42	2042/43	
C10E	Corner of Little Gypps Road and Willow Close	7						7														7
C10F	Ozonias Gardens	17						17														17
C10G	Land between Station Road and Seaview Road	19		Site owned by CPBC, will not progress all sites at once								19										19
Had1	Hadleigh Town Centre	388		Delay to allow time for master planning and redelivery of local services										10	15	18	25	50	70	100	100	388
Had3	Hadleigh Clinic, 49 London Road	14		Delay to allow for master planning and consideration of alternative services						14												14
Had4	Land South of Scrub Lane	114		Site has featured in several local plan iterations, and promoted through the Call for Sites submission.				20	30	30	34											114
Thun2	Kiln Road Campus	730		Delay to allow for master planning with delivery over a longer period due to multiple landowners										80	80	80	80	100	100	100	110	730
Thun3	Thundersley clinic, Kenneth Road	24		Delay to allow consideration of alternative services								24										24
Thun3	Thames Loose Leaf	27		Site currently being marketed, brownfield.					14	13												27
Total		4868	0		0	0	48	131	116	167	182	153	113	390	395	438	465	530	560	600	580	4868
Existing Commitments		Remaining Units at March 2025	Replacements (losses)																			
22/0665/FUL	Garden World Plants Ltd, Canvey Road	55			15	20	20															55
21/1137/FUL	Land Rear of 248 Hart Road, Thundersley	46			10	16	20															46
24/0042/FUL	Walsingham House, Lionel Road, Canvey	33			10	10	13															33
CPT/24/05/FUL	320 London Road, Hadleigh	20			10	10																20
23/0560/FUL	179-195 Church Road, Thundersley	44	13			15	15	14														44
CPT/327/11/FUL	4-12 Park Chase, Hadleigh	25			10	15																25
18/0424/CPA	351-359 London Road, Hadleigh	19					9	10														19
18/0638/FUL	The Haystack Public House, Long Road, Caney	14			14																	14

Site Reference:	Name of Site	Capacity (Gross) at 1 April 2025	Replacements (Losses)	Justification	Start of Plan Period				5 Years					10 Years					15 Years			TOTAL
Draft Castle Point Plan - Site Allocations					2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	2041/42	2042/43	
18/0366/FUL	246-250 High Road, Benfleet	11			5	6																11
23/0423/FUL	Site off the Warren and Tanglewood, Hall Crescent, Hadleigh	12	2			12																12
	Land at Thorney Bay	173			40	40	40	40	13													173
Additional Planning Permissions @ 1 April 2025		287	71		45	45	47	50	50	50												287
Total		739	86		159	189	164	114	63	50	0	0	0	0	0	0	0	0	0	0	0	739
Windfall		675					45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	675
Total Supply (Gross)		6282			159	189	257	290	224	262	227	198	158	435	440	483	510	575	605	645	625	6282
Losses		86			11	19	16	16	12	12												86
Total (Net)		6196			148	170	241	274	212	250	227	198	158	435	440	483	510	575	605	645	625	6196