



castlepoint

benfleet | canvey | hadleigh | thundersley

**STRATEGIC HOUSING  
LAND AVAILABILITY  
ASSESSMENT (SHLAA)**

**FINAL REPORT**

**JANUARY 2009**

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## **Executive Summary**

It is a requirement that local planning authorities undertake a Strategic Land Availability Assessment as part of the planning policy preparation process.

This study has been undertaken to conform with the requirements of PPS 3 (Housing) and the Practice Guidance issued by government in 2007. The study is set in the context of the East of England Plan, the Thames Gateway South Essex Strategic Housing Market Assessment, the Sub-Regional Housing Strategy and the Council's policies on the delivery of housing to meet future needs.

The study demonstrates that most of the borough's needs to 2026 can be met from housing provision in the urban area, particularly town centres, main route corridors and other underdeveloped land. However it is not possible to meet the entire borough's housing needs from these sources. This is particularly the case on Canvey Island where green belt land is required to meet the Island's needs. In the remainder of the borough it may be possible to limit incursion into the green belt for housing purposes to beyond 2026, particularly if employment land is reused for housing provision.

However, this level of housing provision from within the urban area requires the adoption of the LDF Core Strategy and the Canvey Plan and the Benfleet, Hadleigh and Thundersley Plan. With these Development Plan Documents in place the Council will also be able to deliver significant levels of affordable housing provision. Without those documents in place there will only be limited housing provision in town centres and other key parts of the urban area and much greater pressure on the green belt.

## Background

This report has been prepared to comply with the requirements of PPS3 (Housing) published in 2006. The principal aim of the new PPS3 was to underpin the government's response to the Barker Review of Housing Supply and the necessary step changes in housing delivery through a new, more responsive approach to land supply at the local level.

The government's key housing policy goal is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live. To achieve this the government is seeking

- To achieve a wide choice of high quality homes, both affordable and market housing, to address the requirements of the community.
- To widen opportunities for home ownership and ensure high quality homes, both affordable and market housing to address the requirements of the community.
- To improve affordability across the housing market, increasing the supply of housing
- To create sustainable, inclusive, mixed communities in all areas

The PPS imposes a number of requirements on local planning authorities specifically with regard to the delivery of a flexible supply of land for housing. Local Planning Authorities are required to identify broad locations and specific sites that will enable continuous delivery of housing for a least 15 years from the adoption of their Local Development Documents. They are also required to identify sufficient specific deliverable sites to deliver housing in the first five years drawing on information from the Strategic Housing Land Availability Assessment.

In July 2007 the government published the Strategic Housing Land Availability Practice Guidance which gives practical guidance on how to carry out an assessment to identify land for housing and assess the deliverability and developability of sites.

The Practice Guidance requires local planning authorities to:

1. Identify specific deliverable sites for the first five years of the plan that are ready for development.
2. Identify specific developable sites for years 6-10
3. Where it is not possible to identify specific sites for years 11-15 of the plan to indicate broad locations for future growth.
4. Not to include an allowance for windfalls in the first 10 years of the plan.

The Practice Guidance sets out specific requirements for a site to be deliverable and developable. In this context local planning authorities are required to assess a sites suitability for housing, its availability for housing, its achievability for housing and what action might be required to overcome particular constraints.

The Assessment is an important source to inform plan making but it does not in itself determine whether a site should be allocated for housing development. The assessment is not a one-off study and updating it is an integral part of the Annual Monitoring Process.

## Introduction

The Strategic Housing Land Availability Assessment (SHLAA) is part of the Local Development Framework (LDF) process. The LDF for Castle Point will be made up of three of Development Plan Documents (DPDs) as follows:

- **Core Strategy** – this sets out the Spatial Planning Strategy for future development in the Borough;
- **Canvey Island Area Action Plan** – this will set out site specific development, regeneration and growth proposals for Canvey Island; and
- **Benfleet, Hadleigh and Thundersley Plan** – this will set out site specific development, regeneration and growth proposals for Benfleet, Hadleigh and Thundersley.

The information gathered in the SHLAA will inform these documents with regard to the provision of housing in the Borough and ensure that the housing target for Castle point as set out in the East of England Plan is achieved.

The East of England Plan requires that Castle Point provides at least 4,000 new homes between 2001 and 2021. Local Authorities are required to maintain a 15 year supply of housing land at all times. At the 1<sup>st</sup> April 2008 this required the Council to look to 2023 (i.e. beyond the current East of England Plan period). National and regional guidance is clear that the current annualised requirement in the East of England Plan should be rolled forward in circumstances where no clear target exists. To this end a requirement for 200 dwelling units per annum is required in the period beyond 2021.

In order to ensure that this assessment is robust and can support the LDF over time, the Council has looked to 2026 when seeking to identify a sufficient supply of land for housing. This increases the requirement to 5,000 new homes from 2001 to 2026, as the annualised requirement for 2001 – 2021 is rolled forward for 5 additional years.

Work on the SHLAA for Castle Point commenced in April 2007. The Council, building on site specific work undertaken previously for the Urban Capacity Study (2004) took a site specific approach to preparing the SHLAA, following guidance set out in PPS3. The more recently SHLAA Practice Guidance, published in July 2007 advocated such a site specific approach.

The assessment is based on data relating to outstanding permissions and completions as at 1<sup>st</sup> April, 2008. The assessment will be updated in 2009 and then based on data for 1<sup>st</sup> April, 2009. The detailed nature of the work undertaken should ensure that there will be relatively few unidentified sites coming forward particularly in the early years of the study.

Consequently there are unlikely to be significant changes in the overall capacity of the borough to meet its housing needs during the plan period. There may however, be changes in the timescales within which sites could be delivered because of changing economic and social circumstances. This may result in sites coming forward earlier or being delayed. These issues will be addressed in the annual monitoring of housing land supply.

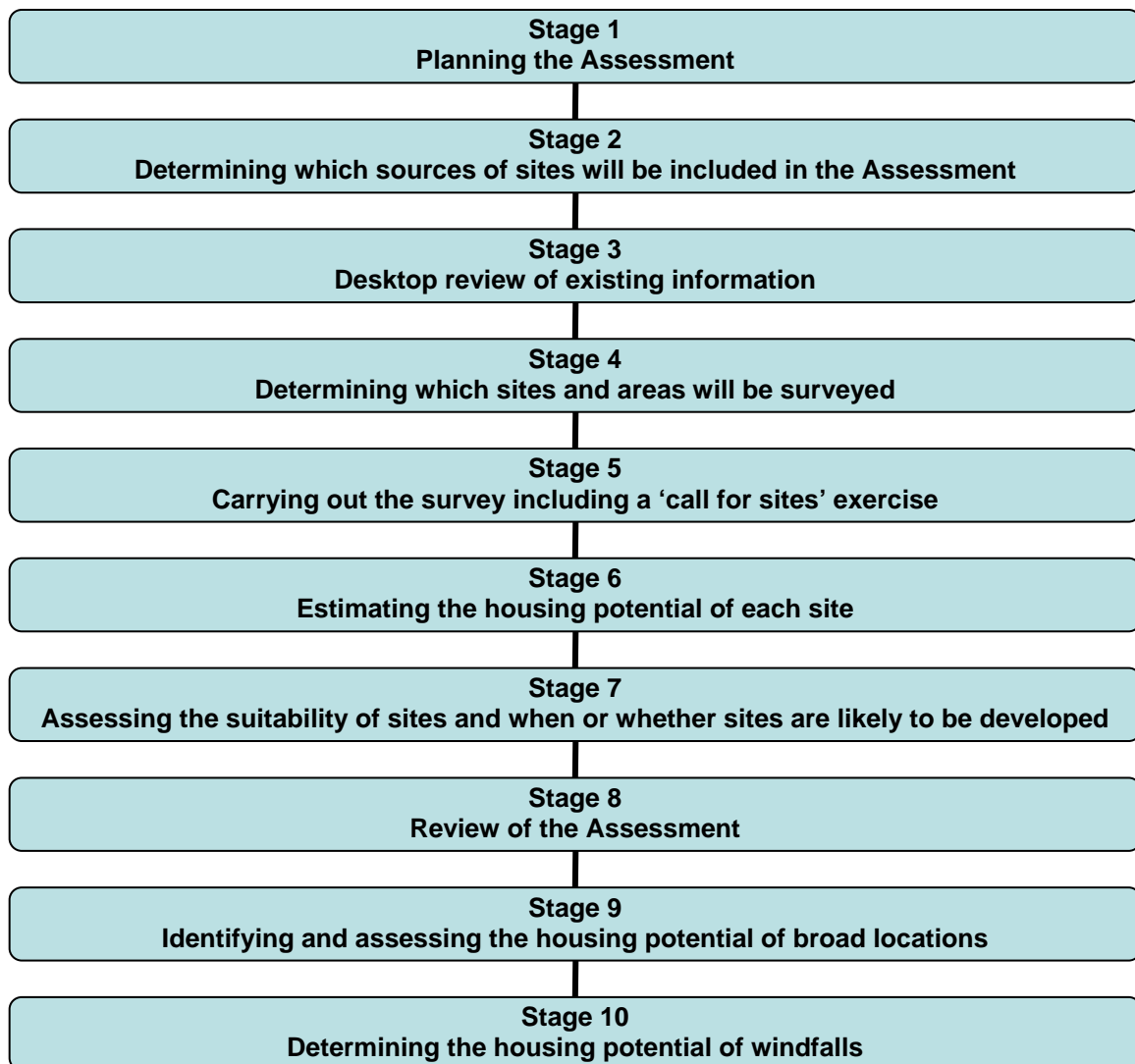
## Study Methodology

### Introduction

The proposed methodology for the SHLAA was initially based on the Draft Guidance on Housing Land Availability Assessments (2005). However, in July 2007 CLG issued new guidance on how to conduct a SHLAA. The new guidance is intended to be “practical” (Para 1) and contains a step by step guide to undertaking an assessment.

Much of the initial assessment work was carried out prior to the release of the new guidance. However, it is considered that the work done up to the release of the new guidance is consistent with the 10 step approach to strategic housing land availability assessments illustrated in figure 1.

**Figure 1: The Key Stages of a Strategic Housing Land Availability Assessment Study**



## **Stages One and Two**

### **Planning the Assessment and determining sources of Housing Supply**

A detailed work programme for the Strategic Housing land Availability Assessment was prepared around the various identified sources of housing supply. An initial review of available information identified six possible sources of housing supply:

- Unimplemented planning permissions for housing;
- Sites without planning consent identified in the Urban Capacity Study (2004)
- Main Routes Survey
- Town Centre Regeneration
- Employment Land Rejuvenation
- Greenfield land

For each identified source of supply a different approach to investigating housing land availability was necessary because of the amount of data already compiled. The process followed for each source is set out later in this section.

### **Establishing a timeframe for the Assessment**

The timeframe for the assessment covers the period from 1<sup>st</sup> April 2008 until 31<sup>st</sup> March 2026. The assessment establishes a baseline as of 1<sup>st</sup> April 2008 and consistent with PPS3 considers housing delivery in a series of time bands as follows:

- 1<sup>st</sup> April 2008 – 31<sup>st</sup> March 2013;
- 1<sup>st</sup> April 2013 – 31<sup>st</sup> March 2018;
- 1<sup>st</sup> April 2017 – 31<sup>st</sup> March 2026.

These time bands enable the Council to establish a 5 year supply of housing as required by PPS3 and measured by National Indicator 154.

In order to ensure a constant five year supply the SHLAA will need to be updated annually as part of the Annual Monitoring Report. This will ensure the SHLAA remains compliant with PPS3. This process will ensure that the housing trajectory and a five year supply of specific deliverable sites is monitored in future years.

### **Establishing a extent for the Assessment**

The assessment covers all settlements in the Borough, consistent with the guidance. It also looked at Greenfield locations within and beyond the urban area.

### **Establishing site size thresholds**

The Practice Guidance does not set a specific site size threshold for the surveying of identified sites. The Council records all net additional dwellings when considering supply from outstanding planning consents. In addition to this the Urban Capacity Study (2004) was site specific and included all sites where one of more additional dwellings could be

provided. To this end, the site size threshold for this assessment is one or more net additional dwellings.

Within this assessment, sites that can accommodate less than 10 dwellings are considered to be small sites. Sites that can accommodate 10 dwelling or more are large sites. This is consistent with a) the type of sites that typically become available in Castle Point and b) monitoring data provided on minor and major planning applications.

This distinction between large and small sites is of assistance when evaluating individual sites and the likelihood of their deliverability.

### **Involving Others**

Consistent with the Practice Guidance, the Council has sought to make contact with landowners, developers, architects and agents of all identified sites in order to determine their aspirations regarding the land under their control. This has helped to determine likely timescales for delivery and make the assessment more robust. The preparation of the SHLAA has also been assisted by informal discussions with local agents/developers.

### **Stages Three to Seven**

As set out previously, a different approach was taken to each source of housing supply in respect of stages three to seven, depending on the amount and type of information already available.

### **Unimplemented Planning Permissions**

For the purposes of this assessment, unimplemented planning permissions are considered to be those sites with planning consent (or consent in principle subject to a S106 Agreement) for housing that were unimplemented at the 1<sup>st</sup> April 2008. Unimplemented permissions are defined as those relating to developments that had not received a completion certificate under building regulations at the 31<sup>st</sup> March 2008.

Information on unimplemented planning permissions was extracted from the Residential Land Availability Assessment completed by the Council annually.

The Residential Land Availability Assessment monitors all sites where a net addition to the housing stock has planning consent. This covers the entire borough, with each site being visited annually to check progress.

Having identified sites from this assessment, the applicants in each instance were contacted in writing to determine their aspirations for the site. The purpose of this was to help determine whether they proposed to deliver the housing for which they had planning consent.

In all instances where the sites were retained within the survey following contact with the applicants, the housing potential for the site was determined to be the number of

homes for which they had planning consent. Respondents were asked to advise whether their site/s would be likely to come forward in the next five years.

In some instances, sites were removed from the supply where they had been redeveloped for alternative purposes under a separate consent, or where the landowner indicated that they did not wish to pursue the consent for reasons that would make the land unavailable or unsuitable for development during the plan period. The remaining supply was scrutinised to ensure that the sites were deliverable in accordance with the guidance in PPS3.

### **Urban Capacity Study (2004)**

The Urban Capacity Study was completed in 2004. It identified the unrealised potential for residential development from all sources of land and property within the study area that did not benefit from planning permission.

The area for the study was defined by the inner Green Belt boundary within Castle Point, and only sites within the existing urban areas were included as part of the study.

Information within the Urban Capacity Study was reviewed, sorting the sites identified into four categories:

- 1) Those that were now the subject of planning consents;
- 2) Those in areas to be re-surveyed as part of the Main Route Survey;
- 3) Those in Hadleigh and Canvey Town Centres;
- 4) Those in areas of Employment Land Rejuvenation;
- 5) All other sites.

In order to avoid double counting, all those sites that fell in to categories 1 to 4 were removed and addressed elsewhere in the study. Those that fell within category 5 were treated as set out below.

These remaining sites were mainly small sites that fell within residential areas of the Borough. The Urban Capacity Study had applied local space standards in order to determine the capacity of these sites, and as a result the capacity identified through the Urban Capacity Study continued to be applied.

Having identified sites and their capacities from this assessment, the landowners in each instance were contacted in writing to determine their aspirations for the site. The purpose of this was to help determine whether they proposed to seek planning consent for the capacity of housing proposed, and in which time period.

Where a positive response was received that indicated that the site would be delivered during a specific time period, the site was retained within the survey and the site allocated to the time period indicated.

Where a negative response was received, with the owner indicating that they would never redevelop the site to provide net additional dwellings, the site was removed from the capacity for deliverability purposes. A separate list of these sites has however been

retained internally for use during the review in 2011, as the landowner or the landowners aspirations may have changed by this time.

Many landowners did not respond to the consultation and consequently consideration was given to how those sites might be distributed across the categories of housing delivery.

### **Main Routes Survey**

The Practice Guidance suggests that the following areas may be areas of change and worthy of more detailed assessment as part of the strategic land availability assessment.

- **Development hotspots** that are the focus of recent planning permissions;
- **Town and district centres** and their surrounding pedestrian catchments<sup>1</sup>. These areas are often characterised by more frequent land use change and are most likely to contain development opportunities;
- **Principal public transport corridors** and their walking catchments. These areas are not necessarily more likely to contain development opportunities however, they are considered to be more sustainable where there is a good level of accessibility of the transport stops or interchange.

A review of housing completion data for previous years revealed that town centres and main transport routes in Castle Point had been development hotspots. It was also found that where sites had previously been identified in these locations, they had been assessed at a lower capacity than what had been achieved in reality.

The value in terms of sustainability of locating a mix of uses along the busy main routes through the borough is now well recognised in national policy. This has led to a change in the types of development that are considered appropriate in these areas. Recently applications for mixed use developments have been approved in town centres with commercial units at ground floor and small residential units above. Flats have been found to be suitably located and enjoy an advantageous position near key transport interchanges and key commercial and public services. This has led to a change in the character of these areas and therefore has created further future development potential.

As part of this process consideration was given to the density of development that has been achieved between 2001 and 2007. The table below demonstrates the increase in densities achieved largely as a result of development in town centres and along main routes.

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<sup>1</sup> Pedestrian Catchments are commonly defined as the areas within 10 minute walk (up to 800m) of an established centre.

**Figure 2: Density of New Residential Developments (Sites 0.1ha+ in size)**

Year 1 <sup>st</sup> April -31 <sup>st</sup> March	Percentage of New Homes built at: (Dwelling units per Hectare)		
	<30	30 - 50	>50
2001 – 2002	14.2	85.8	0
2002 – 2003	1.6	98.4	0
2003 – 2004	1.6	83.7	14.6
2004 – 2005	0.8	68.0	31.2
2005 – 2006	2.3	25.1	72.6
2006 – 2007	6.9	15.5	77.6
2007 - 2008	3.1	0	96.8

As a result, it was determined that a physical survey of the main routes through the borough was required in order to evaluate the development potential of sites in these locations that may have arisen or changed since the Urban Capacity Study was prepared. The main routes were specifically A13, A129, Benfleet High Road, Benfleet High Street, Long Road, Furtherwick Road and Canvey High Street.

In addition to this, a “call for sites” was also carried out in March 2007, in order to identify any additional sites beyond the main routes that may have emerged since the Urban Capacity Study. It was intended that these would be surveyed also. However, the call for sites did not give rise to any further sites in the urban area. All the sites identified were in the Green Belt and are dealt with separately under the Greenfield section of this report.

Following the physical survey of the main routes, a number of potential development sites were identified. These sites were presented to a group of development control and planning policy officers for review against local policy considerations. As a result, some sites were removed because they were not considered deliverable.

Those sites that were located within Canvey and Hadleigh town centres were also removed from the study to avoid double counting. These town centres are to be the subject of master plans that identify capacity based on comprehensive redevelopment. These are referred to later.

The capacity of the remaining sites was then determined using local space standards and comparable recent developments in similar locations. Examples of schemes used for comparison were the sheltered housing schemes at the Wagon and Horses, Hadleigh, and at 120 Long Road, Canvey Island. Examples of flatted schemes were Oak Road South, Hadleigh and on Linden Road, Benfleet. Estimates of capacity reflected officers’ views as to what number of units would be likely to obtain planning permission for each site.

Having identified sites and their capacities from this survey, the landowners in each instance were contacted in writing to determine their aspirations for the site. The purpose of this was to help determine whether they proposed to seek planning consent for the capacity of housing proposed, and in which time period.

Where a positive response was received that indicated that the site would be delivered during a specific time period, the site was retained within the survey and the site allocated to the time period indicated.

Where a negative response was received, with the owner indicating that they would never redevelop the site to provide net additional dwellings, the site was removed from the capacity for deliverability purposes. A separate list of these sites has however been retained internally for use during the review in 2011, as the landowner or the landowners aspirations may have changed by this time.

Many landowners did not respond to the consultation and consequently consideration was given to how those sites might be distributed across the categories of housing delivery. This is referred to later in the document.

### **Town Centre Regeneration**

The town centres of Hadleigh and Canvey Island are considered to be key areas of change, with Hadleigh Town Centre in particular having seen significant redevelopment over the last five years. This has resulted in a call for a master planning approach to each of the centres.

Work on the Hadleigh Capacity Study commenced in 2007 in partnership with private sector consultants Dedmans. The initial work has identified the potential to achieve comprehensive regeneration of the centre by redeveloping several parcels of land. This work which has already achieved private sector involvement will be used to inform the capacity identified for the Town Centre. The figure will be adjusted to take account of relevant outstanding consents in the town centre.

An initial assessment of the capacity of Canvey Town Centre was set out in the Canvey Island Sustainable Regeneration Report 2006. This assessment assumed a comprehensive approach to the regeneration of the town centre, assuming a development density of 100 dwelling units per hectare. It is however considered that this initial work was unrealistic and a new masterplan is now underway. Work on the masterplan is being carried out under a steering group arrangement comprising of public and private bodies. This will help to ensure that the capacity figure identified is realistic and deliverable.

A proactive approach to the delivery of regeneration in these centres will be required if the level of housing expected is to be delivered. There is evidence from the Regeneration Partnership that there is a willingness to take such an approach.

### **Employment Land Rejuvenation**

Not all employment land in the Borough is provided in the best location for accessibility, particularly by larger vehicles. In addition to this, there is evidence of underinvestment in employment buildings and inefficient use of land. To this end, the Council has identified two employment locations at Point Industrial Estate on Canvey Island, and at Manor Trading Estate that would benefit from partial or total land rejuvenation for housing

purposes, supported by alternative employment land allocations in more accessible locations elsewhere in the borough.

In each location, land ownership and contaminated land issues have been investigated in order to identify constraints to delivery. The capacity of each location was then assessed using a development density of 40 dwelling units per hectare. The use of this density reflected the relatively large size of the employment locations, enabling a mix of dwelling types to be provided relatively unconstrained by local streetscene issues affecting smaller sites.

The phasing of the capacity in these locations was determined having regard to information on landownership and perceived difficulties in gaining cooperation from landowners for redevelopment. In both cases there is evidence that land for housing use would come forward during the lifetime of the plan. It is considered in some instances a proactive approach to the delivery of rejuvenation of these employment locations including the use of powers available to the Local Authority may be required if the level of housing expected is to be delivered.

### **Greenfield Land**

Greenfield land is land that has not been previously developed that is either within or beyond the existing urban area.

There are two Greenfield sites with allocations for long-term housing and not in the Green Belt at Kiln Road and Scrub Lane that have yet to be realised as part of the Local Plan. These allocations both have a planning history and this was investigated as part of the SHLAA in order to determine the capacity and the potential for delivery. This involved discussions with the relevant parties in order to determine their aspirations and identify barriers to delivery.

Through the “call for sites” process, additional Greenfield sites without a housing allocation were also identified to the Council by landowners/developers. These sites were all located entirely within the Green Belt, where there is a presumption against development except in exceptional circumstances. As a result of this designation, these Greenfield Sites were not considered developable without an assessment of the sustainability of broad locations in the Borough. This element of the assessment did not yield additional capacity at this stage in the process.

### **Distribution of Capacity**

The distribution of the delivery of the capacity identified has followed the approach set out in the Practical Guidance particularly Stage 7. This is because any inspector who reviews the SHLAA or subsequently considers a planning appeal where housing capacity is an issue will be bound to follow that Guidance in coming to a decision.

### **Stage 8: Review of Assessment**

Having completed stages 3 to 7 of the Strategic Housing Land Availability Assessment, the data from each part of the assessment was compiled into a single database in order

to produce an indicative housing trajectory that sets out how much housing can be provided in Castle Point within the **Urban Area**, and at which point in the future it can be delivered.

The first trajectory includes only those sites in the urban area and indicated that there was insufficient land available within the existing urban settlements to meet the housing requirements set out in the East of England Plan, and further requirements up until 2026.

A second trajectory was therefore prepared that included those **Greenfield Sites** at Kiln Road and Scrub Lane with an existing allocation for long-term housing. The inclusion of these sites went some way towards addressing the gap in housing land supply; however this was still short of the East of England Plan requirement.

It was therefore necessary to identify additional locations for housing delivery in Castle Point if the Borough is to achieve the required levels of housing provision. As a result stages 9 and 10 of the Practice Guidance were undertaken.

### **Stage 9: Identifying and assessing the housing potential of broad locations**

As a result of the insufficient capacity of the urban area, and allocated Greenfield sites in Castle Point, it has been necessary to consider broad locations for future development as part of the work on the SHLAA. Two main options emerged with regard to this.

The first option was the redevelopment of the Hazardous Installation terminals at South Canvey. These cover a substantial area of land and their redevelopment would meet the remaining housing need in its entirety and provide additional infrastructure including contributions towards a third access from Canvey Island. In addition to this, the land is previously developed and the removal of the hazardous installations for a mix of uses including housing would make the Borough safer.

The Council has met with the owners of these sites and has found that this land is unlikely to become available for development in the short to medium term. Although the Council intends to take a proactive approach in the future development of this location, the Council will need to enter into a lengthy process of engagement with the landowners as part of this process. There would also need to be significant infrastructure investment before sites in this location could become available. Compulsory acquisition would not be sustainable at this time. As a result, the Council was unable to identify this as a developable location at present.

The continued presence of these hazardous installations also prevents the development of other land nearby for housing such as the Thorney Bay Holiday Park (previously allocated for long term housing in the Local Plan). This site has a potential capacity in excess of 400 dwelling units but is not considered to be a developable location at this time.

A further consideration is that the development of such a substantial area in South Canvey for residential purposes would not meet all of the needs generated in Benfleet,

Hadleigh and Thundersley. The Borough would therefore have to consider how these needs would be met.

The second option was therefore to encroach into the Green Belt. As set out previously, the Call for Sites identified a significant number of sites within the Green Belt. These sites provide a potential source of housing land that could meet the outstanding requirement and as such they have been assessed in order to determine their developability.

In order to assess the developability of these sites, they were subject to tests against sustainability criteria established in earlier rounds of the Core Strategy development as it was considered that developable sites in the Green Belt must be sustainable. The sustainability criteria considered issues that may constrain delivery including the provision of infrastructure and the presence of nature conservation interests, amongst other things. The full lists of criteria and the individual site assessments are set out in a separate document entitled "Assessment of the Sustainability of Sites on the Urban Periphery".

In addition to assessing the sustainability of sites, and before the assessments were finalised, the Council met with each of the landowners/developers to discuss their aspirations for the land in their control and identify constraints and barriers for delivery. Where barriers were identified, how they could be overcome was also discussed.

Where a developer had drawn up a set of proposals that complied with the national minimum dwelling density standard set out in PPS3, this was applied as the site's capacity. Where proposals were at an early stage and the capacity was unclear, a range was applied to the site using 30 dwelling units per hectare as the minimum and 50 dwelling units per hectare as the maximum figure.

Following these discussions with landowners and developers, the Council also discussed each location with the local highways authority in order to determine issues of deliverability associated with the sites identified.

As a result of this work, the number of Green Belt sites, and therefore the capacity of Green Belt land was reduced to only include positively sustainable and deliverable Green Belt locations for development. .

### **Stage 10: Determining the housing potential of windfalls (where justified)**

The purpose of the SHLAA is to make every reasonable effort to identify the potential sources of housing supply in the Borough for the period 2008 – 2026. However, changes in property ownership and the housing market have the effect of introducing uncertainty into the SHLAA, and mean that it is impossible to identify every source of potential housing supply. To this end it is expected that unidentified sources will form a proportion of the supply. This is known as windfall.

The Practice Guidance advises that an allowance for windfall should not be included for the first ten years of the plan period. This is because, it is expected that the SHLAA will

reduce the number of windfall developments occurring due to the detailed surveying involved. To this end, the SHLAA for Castle Point does not include a windfall allowance for the first ten years, where identified sources are more likely to have an effect. However, it becomes increasingly difficult to predict future sources over time, and therefore, a windfall allowance has been included for the last 8 years of the assessment.

The windfall allowance has been calculated by comparing planning permissions granted during the period 1<sup>st</sup> April 2004 and 31<sup>st</sup> March 2008 against sites identified in the Urban Capacity Study 2004.

Where a site was not included within the Urban Capacity Study, this was recorded. Each site was then checked with regard to its location on a main route as identified in the main route survey, or within Canvey or Hadleigh Town Centres. Three figures were identified as a result:

- 1) Non-UCS main route windfall
- 2) Non-UCS town centre windfall
- 3) Non-UCS other windfall

Each figure was annualised over the four year period. A discount of 80% was then applied to the main route annualised figure, to represent the fact that the main routes had been resurveyed and therefore windfalls were less likely, although possible given the changing nature of such locations.

A discount of 100% was applied to the town centre annualised figure to account for the comprehensive nature of any development expected to occur and the non-site specific nature of figures identified for these locations.

A discount 50% was applied to the other sites identified as not being in the UCS. The relatively lower discount reflects the fact that these areas were not re-sampled as part of the SHLAA 2008. A discount was however considered appropriate given that there are a finite number of sites with the potential for redevelopment, although the extent of such supply is variable dependent upon the strength of the housing market.

## Assessment Results

The following section sets out the assessments findings with regard to each of the different sources of potential housing land supply. GIS data identifying sites from the different sources accompanies this report and should be used alongside this report.

### Unimplemented Planning Permission

At the 31<sup>st</sup> March 2008 there were **459 traditional dwelling units** with extant planning permission (excluding extant permissions for developments in Hadleigh Town Centre, which are included in the separate supply table set out later in this report). Extant planning permissions remain valid for up to five years, allowing a reasonable period in which implementation can occur.

The owner of each site was contacted in order to determine the likelihood of their scheme being delivered. The results of this survey were combined with an assessment of the developability of the sites. It was considered that these sites were developable and likely to contribute to the housing supply during the period to 2013.

In addition to the unimplemented planning permissions for traditional homes, there were also **112 permanent residential mobile homes** proposed and outstanding at Kings Park Homes. Due to a change in planning condition granted in the early 1990's the owners of this caravan site have gradually replaced holiday home accommodation at this site with mobile homes for residential occupation. A plan presented to the Council indicated a total capacity of 582 mobile homes remained at 1<sup>st</sup> April 2001. Only 112 units remain to be provided.

The un-implemented planning permissions are sub-divided into small and large sites. The mix of small and large sites has a bearing on deliverability, with small sites providing a smaller but more consistent supply and large sites providing more homes, but only at times where the market is suitable.

The analysis demonstrates that a total of 419 **dwelling**s may come forward from large sites (10 or more dwelling units) with un-implemented planning permission.

Meanwhile, **152 dwelling**s may come forward from smaller sites (less than 10 dwelling units) with un-implemented planning permission.

Spatially, these sites were distributed as follows:

**Figure 3: Spatial Distribution of Unimplemented Planning Consents**

Community	Small Sites	Large Sites	Total
Canvey	49	138	187
Kings Park Homes	0	112	112
Benfleet, Hadleigh & Thundersley (excl. Identified Sites in Hadleigh Town Centre)	102	170	272
<b>Total</b>	<b>151</b>	<b>420</b>	<b>571</b>

## **Urban Capacity Study (2004)**

Following the sorting process that removed sites with Planning Permission, those sites in the main route survey and sites in Canvey and Hadleigh Town Centres, a capacity of **523** dwelling units without planning permission remained of the sites identified in the Urban Capacity Study (2004).

The owner of each site was contacted in November 2007 in order to determine the likelihood of their scheme being delivered. The following response was received:

**Figure 4: Urban Capacity Responses**

<b>Response</b>	<b>2008 – 2013</b>	<b>2013 – 2018</b>	<b>2018 - 2026</b>	<b>Never</b>	<b>No response</b>	<b>Total</b>
<b>Number of Dwelling Units</b>	79	64	32	97	251	<b>523</b>
<b>Proportion of Urban Capacity (%)</b>	15%	12%	6%	19%	48%	<b>100%</b>
<b>Proportion of Urban Capacity (%) with a response</b>	29%	23%	12%	36%		<b>100%</b>

The proportion of dwelling units which were subject to no response was about 48% of the total number of dwelling units within the Urban Capacity Study. A consideration of the implications of the non-response rate in respect of the UCS and the Main Route Survey is addressed later in the document. However the approach set out below has been followed in respect of both components of land supply.

In order to distribute the capacity without a response over time, it is necessary to have regard initially to those responses that were received. Landowners indicated that 36% of the Urban Capacity Study sites would never be delivered ( $97 \div (523-251)$ ). The capacity without a response was therefore reduced by this proportion from 251 units to 161 units.

The remaining 161 units were then annualised between 2013 and 2026. This provides an annual rate of 12.38 dwelling units per annum. The sites without a response were not included within the first five years of the assessment period as there is currently no progress towards planning permission for the capacity identified. The lag provides time for the design and planning process to be negotiated.

**Figure 5: Urban Capacity Study Capacity at 1<sup>st</sup> April 2008**

Response	2008 – 2013	2013 – 2018	2018 – 2026	Total Capacity	Never	Total
a) Number of Dwelling Units with response	79	64	32	175	97	272
b) Number of years in which the annualised no response capacity will be delivered.	0	5	8		36% of 251	
c) Redistribution of dwelling units with no response (b*16.08)	0	62	99	161	90	251
d) Total Capacity (a + c)	79	126	131	336	187	523

The sites where the owner indicated that they never intended to develop were removed from the assessment as this provided certainty that they would not be developed in due course. The capacity from the urban capacity study has therefore been reduced from 523 dwelling units to 336 dwelling units.

These units are distributed as follows:

**Figure 6: Spatial Distribution of the Urban Capacity Study Capacity**

Community	Small Sites	Large Sites	Total
Appleton	38	0	38
Boyce	35	0	35
Cedar Hall	13	0	13
St. Georges	4	0	4
St. James	15	0	15
St. Marys	15	0	15
St. Peters	20	16	36
Victoria	23	0	23
<b>Benfleet sub-total</b>	<b>163</b>	<b>16</b>	<b>179</b>
Canvey Island Central	28	0	28
Canvey Island East	46	0	46
Canvey Island North	16	0	16
Canvey Island South	27	14	41
Canvey Island West	13	0	13
Canvey Island Winter Gardens	13	0	13
<b>Canvey sub-total</b>	<b>143</b>	<b>14</b>	<b>157</b>
<b>Borough Total</b>	<b>306</b>	<b>30</b>	<b>336</b>

## Main Route Survey

The routes identified in the methodology were sampled, and then officers removed those that were considered unsuitable on the basis of design, access or policy issues. This provided a potential capacity of 1,138 dwelling units.

The owner of each site was contacted in November 2007 in order to determine the likelihood of their scheme being delivered. The following response was received:

**Figure 7: Main Route Survey Responses**

Response	2008 – 2013	2013 – 2018	2018 - 2026	Never	No response	Total
<b>Number of Dwelling Units</b>	123	321	66	257	371	<b>1138</b>
<b>Proportion of Urban Capacity (%)</b>	11%	28%	5%	23%	33%	<b>100%</b>
<b>Proportion of Urban Capacity (%) with a response</b>	16%	42%	9%	33%		<b>100%</b>

The proportion of dwelling units which were subject to no response was about 33% of the total number of dwelling units within the Main Route Survey. A consideration of the implications of the non-response rate in respect of the UCS and the Main Route Survey is addressed later in the document. However the approach set out below has been followed in respect of both components of land supply.

In order to distribute the capacity without a response over time, it is necessary to have regard initially to those responses that were received. Landowners indicated that 33% of the Main Route Survey sites would never be delivered ( $257 \div (1138-371)$ ). The capacity without a response was therefore reduced by this proportion from 371 units to 249 units.

The remaining 249 units were then annualised between 2013 and 2026. This provides an annual rate of 19.15 dwelling units per annum. The sites without a response were not included within the first five years of the assessment period, as there is currently no progress towards planning permission of the capacity identified. The lag provides time for the design and planning process to be negotiated.

**Figure 8: Main Route Survey Capacity at 1<sup>st</sup> April 2008**

Response	2008 – 2013	2013 – 2018	2018 – 2026	Total Capacity	Never	Total
<b>a) Number of Dwelling Units with response</b>	123	321	66	<b>510</b>	257	<b>767</b>
<b>b) Number of years in which the annualised no response capacity will be delivered.</b>	0	5	8		33% of 371	
<b>c) Redistribution of dwelling units with no response (b*22.69)</b>	0	95	153	<b>248</b>	123	<b>371</b>
<b>d) Total Capacity (a + c)</b>	123	416	219	<b>758</b>	380	<b>1138</b>

The sites where the owner indicated that they never intended to develop were removed from the assessment as this provided certainty that they would not be developed in due course. The capacity from the main route survey has therefore been reduced from 1138 dwelling units to 758 dwelling units.

These units are distributed as follows:

**Figure 9: Spatial Distribution of the Main Route Survey Capacity**

<b>Main Route</b>	<b>Capacity</b>
High Road	116
Kiln Road	69
London Road	47
Rayleigh Road	98
Tarpots	110
<b>Benfleet, Hadleigh and Thundersley sub-total</b>	<b>440</b>
Canvey Road	4
Eastern Esplanade	129
Furtherwick Road	57
High Street	77
Long Road	51
<b>Canvey Island sub-total</b>	<b>318</b>
<b>Borough Total</b>	<b>758</b>

NOTE: The main route survey does not include Canvey and Hadleigh Town Centres in order to avoid double counting.

## **Town Centre Regeneration**

Both Canvey and Hadleigh Town Centres are to be the subject of masterplanning work which will identify in detail how these centres will develop during the lifetime of the Core Strategy.

### **Canvey Town Centre**

The Canvey Island Sustainable Regeneration Report was completed in 2006. This report identified the potential to accommodate **770** dwelling units in the town centre as part of a comprehensive programme of redevelopment. This assumed a dwelling density of 100 dwelling units per hectare.

In order to achieve this level of development requires substantial land assembly and highway adjustment. There are also concerns about the capacity of the town centre to also accommodate reasonable levels of retail and office space at this level of housing. As a result, the reality of the report has been called into question with regard to the town centre. Further work on a Town Centre masterplan is currently being commissioned seeking a more realistic approach to identifying development opportunities and development parcels.

Initial discussions of the steering group leading the masterplanning work have indicated that a capacity in the region of **400 – 500 units** is more realistic. This represents a dwelling density of between 50 and 65 dwelling units per hectare and is considered more deliverable, particularly given its consistency with density levels suggested in the Urban Place Supplement for urban centres, and allowing for other types of first floor usage to occur, such as offices, without jeopardising targets for housing delivery.

Unlike Hadleigh there has been limited development interest to date in redeveloping Canvey Town Centre. At 1<sup>st</sup> April 2008 there were no unimplemented planning permissions for additional dwelling units in Canvey Town Centre.

Given the lack of development interest to date, the current stance of the Environment Agency regarding new development on Canvey, and the need to advance a masterplan further, the capacity of Canvey Town Centre will take longer to come forward for development. As a result the temporal distribution of development opportunities in Canvey Town Centre is expected to be as follows:

**Figure 10: Temporal Distribution of the Canvey Town Centre Capacity**

	<b>2008 – 2013</b>	<b>2013 – 2018</b>	<b>2018 – 2026</b>	<b>Total</b>
<b>Canvey Town Centre</b>	0	200	200	400

This distribution assumes the lower level of delivery at 400 dwelling units (50 dwelling units per hectare).

### **Hadleigh Town Centre**

A Capacity Study of Hadleigh Town Centre was undertaken by Dedmans and Atkins in 2008. This report will be made available for public inspection following consultation on its contents with local businesses. The document will inform the Hadleigh Town Centre Masterplan which will be prepared as part of the Benfleet, Hadleigh and Thundersley

Plan. The Dedmans/Atkins Study identified a potential capacity of 599 dwelling units as part of a comprehensive re-development programme across a number of parcels of land. Land assembly and highway adjustment would be required to achieve such a capacity.

Officers have assessed the sites identified in the Dedman/Atkins Study and consider that at least one of the sites identified (the allotments to the south of London Road) is not achievable. There are also concerns about other sites unless current uses can be accommodated elsewhere (i.e. the bus depot on the London Road). In view of this it is considered that the maximum long-term capacity in Hadleigh Town Centre in excess of sites with unimplemented planning permission is the order of 485 dwelling units.

With regard to the deliverability of this capacity throughout the plan period it is considered that the lack of a town centre masterplan will make it more difficult to maximise the capacity of the town centre and secure delivery in the next five years. This is likely to lead to a further fragmented approach to delivery which has characterised the town centre in the past.

At the 1<sup>st</sup> April 2008 there was extant permission for 72 units and construction had been commenced in respect of 47 units. These 47 units therefore form part of the Borough's five year supply. However this is not the case with the remaining 25 units where progress has not been made to satisfy the requirements of the Practice Guidance. The 485 unit capacity referred to above has therefore been distributed equally between 2013-2018 and 2018-2026.

**Figure 11: Temporal Distribution of the Hadleigh Town Centre Capacity**

	<b>2008 – 2013</b>	<b>2013 – 2018</b>	<b>2018 – 2026</b>	<b>Total</b>
<b>Hadleigh Town Centre</b>	47	187	298	<b>532</b>

## **Employment Land Rejuvenation**

Two employment areas in Castle Point are considered to be particularly poorly located. These are Point Industrial Estate, Point Road Canvey Island and Manor Trading Estate, Church Road, Benfleet.

### **Point Industrial Estate**

Point Industrial Estate is located at Canvey Point, at the very east of Canvey Island. It is a significant distance from the strategic road network and is served by relatively sub-standard road network not suited to larger vehicles. The estate was allocated for housing in the Adopted Local Plan 1998. Recently, the owners of just over half the land in this location have indicated a desire to redevelop the land for residential use. Initial discussions have revealed the potential to accommodate at least **100** units on the **Canvey Supply** element of the site.

The **Prout Industrial Estate** adjacent to the Canvey Supply land is in more fragmented ownership, and indications from the landowners suggest that housing in this location will not be delivered until later in the plan period, although successful development of the Canvey Supply Site may trigger development earlier. The capacity of the Prout Site is considered to be in the region of **75 - 100** units.

This would see the complete removal of employment land from this location, in favour of more accessible land to the western side of Canvey Island.

### **Manor Trading Estate**

Manor Trading Estate is located on Church Road in Thundersley. The estate is removed from the strategic highway network and Church Road is not suited to the large vehicles that service the estate. However, the estate is well occupied and its removal as an employment area is considered inappropriate in terms of employment and economic development. Regeneration and limited growth is therefore considered a more appropriate approach to dealing with issues in this employment location.

The buildings on the estate are largely of a poor quality and the frontage of the estate creates a negative image of employment in this location. It is therefore considered appropriate to stimulate regeneration in this location by redeveloping land along the frontage of the estate for residential purposes. The frontage has the potential to provide around 5 hectares of land for residential purposes. This would provide around **200** homes at a density of 40 dwelling units per hectare. This density is considered appropriate given the size of land available preventing existing streetscene constraints limiting density.

Land in this location is in multiple-ownership and therefore land assembly is likely to be required. The Council would need to be prepared to use its Compulsory Purchase powers to achieve the redevelopment of this land if required.

It is recognised that many companies operate successful businesses from this location. The Council would wish to encourage the continuation of these businesses within the Borough. As a result the development of this land for residential purposes is dependent on some land being made available in the Green Belt for employment purposes. Green

Belt land release will be restricted to the area of employment land lost and aligned to sites identified in the sustainability assessment referred to earlier. The realisation of this capacity is therefore dependent upon the adoption of the Core Strategy and the Benfleet, Hadleigh and Thundersley Plan.

It is also recognised that there is the potential for land to be contaminated in this location, requiring decontamination to occur before development for residential purposes can go ahead. To this end, delivery in this location is not expected to occur during the first five years of the plan period.

The potential development land is located East and West of Armstrong Road. The area of land to the West of Armstrong Road is smaller in size and involves less landowners. It is therefore likely to be delivered sooner. Land to the East of Armstrong Road is likely to take longer to be delivered given its size.

### Temporal Distribution

In view of the current opposition to new housing development on Canvey Island from the Environment Agency, it is not possible to allocate any of the supply from this area to the period 2008-2013. This would change if the Core Strategy was in place and the Environment Agency's concerns had been resolved through that process. Taking into account the Practice Guidance, none of the capacity from the Manor Trading Estate can be allocated to the period 2008-2013 and this has therefore been split between later periods.

**Figure 12: Temporal Distribution of Employment Land Rejuvenation Capacity**

Employment Location	Site	2008 – 2013	2013 – 2018	2018 - 2026	Total
Point Industrial Estate	Canvey Supply	0	100	0	100
	Prouts Industrial Estate	0	0	75	75
Manor Trading Estate	East of Armstrong Road	0	35	100	135
	West of Armstrong Road	0	65	0	65
<b>Total</b>		<b>0</b>	<b>200</b>	<b>175</b>	<b>375</b>

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**Overall Capacity of Previously Developed Land in the Existing Urban Area**

As of the 1<sup>st</sup> April 2008, the capacity of the urban area was as follows:

**Figure 13: Previously Developed Land Capacity**

Source of Housing Land	2001 – 2008	2008 – 2013	2013 – 2018	2018 - 2026	Total
Implemented Planning Consents	1,228	0	0	0	1,228
Unimplemented Planning Consents	0	571	0	0	571
Urban Capacity Study (2004)	0	79	126	131	336
Main Route Survey	0	123	416	219	758
Hadleigh Town Centre	0	47	187	298	532
Canvey Town Centre	0	0	200	200	400
Employment Land Rejuvenation	0	0	200	175	375
<b>Total</b>	<b>1,228</b>	<b>820</b>	<b>1,129</b>	<b>1,023</b>	<b>4,200</b>
<b>Requirement</b>	<b>1,400</b>	<b>1,000</b>	<b>1,000</b>	<b>1,600</b>	<b>5,000</b>
<b>Variance</b>	<b>-172</b>	<b>- 180</b>	<b>+ 129</b>	<b>-577</b>	<b>- 800</b>

This table demonstrates that there has been an under delivery of new dwellings in the period 2001-2008 and there is insufficient capacity in the Urban Area to make up this shortfall and provide a five year supply to the 31<sup>st</sup> March 2013. The deficit in capacity from within the urban area at the 1<sup>st</sup> April 2008 was 352 units.

It was also not possible to identify a 15 year supply to 2023. In view of these considerations it was necessary to consider the potential supply from Greenfield sites beyond the urban area.

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## **Greenfield Sites**

Two Greenfield Sites with a combined capacity of about 350 dwelling units remain undeveloped following allocation in the Adopted Local Plan 1998. These sites were both identified as long-term housing sites and therefore their earlier development was not anticipated by this plan.

The landowners in both instances have begun to progress development proposals, and therefore a lot of the information on these proposals was available in written files and through discussions with the landowners directly.

### **Kiln Road**

An outline application for **310** homes on this site was received by the Council in 2004. This development proposal was at 29 dwelling units per hectare. However, the site has significant biodiversity issues which needed to be addressed before permission could be granted.

Ecological information was submitted in 2007 and the outcomes of this information have reduced the developable area of land. However, to make the best use of this site it would be appropriate to seek a development density in the region of 40 dwelling units per hectare. As a result a capacity of 310-320 dwelling units on the site is still considered achievable.

There are also significant biodiversity and land ownership issues which need to be resolved, and because of this to include the site in the supply for 2008-2013 would not comply with the Practice Guidance. It is therefore considered that the site will come forward mainly in the period 2013-2018.

**Figure 14: Temporal Distribution of the Capacity at the Kiln Road Site**

	<b>2008 – 2013</b>	<b>2013 - 2018</b>	<b>2018 - 2026</b>	<b>Total</b>
<b>Kiln Road</b>	0	250	60	310

### **Scrub Lane**

An application for up to 20 dwelling units on this site was received by the Council in 2007. This development proposal was at less than 30 dwelling units per hectare.

The application was refused for being underdevelopment contrary to PPS3. There were also concerns with regard to the mix of housing types to be provided on the site. The applicants have discussed these matters further with the Council and are now aware of the Council's expectations.

A basic application of dwelling densities suggest that this site has the potential to accommodate up to 62 dwelling units at 30 dwelling units per hectare. There are however aspirations to replace Hadleigh Junior School on part of the site. As a result, the capacity of the site has been reduced to **40** dwelling units to accommodate this.

This would however leave the junior site available for conversion/redevelopment for housing purposes and this site has therefore been included within the Urban Capacity Study information.

The site is capable of delivery in the first five years and the landowner has expressed an interest in disposing of this land for this purpose. It is therefore included in the first five year capacity.

**Figure 15: Temporal Distribution of the Capacity at the Scrub Land Site**

	<b>2008 – 2013</b>	<b>2013 – 2018</b>	<b>2018 – 2026</b>	<b>Total</b>
<b>Scrub Lane</b>	40	0	0	40

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**Overall Capacity of Land Allocated for Housing in Castle Point**

The urban area, and Greenfield Sites allocated for housing development in the Adopted Local Plan 1998 have the following capacity:

**Figure 16: Allocated Land Capacity**

<b>Source of Housing Land</b>	<b>2001 – 2008</b>	<b>2008 – 2013</b>	<b>2013 – 2018</b>	<b>2018 - 2026</b>	<b>Total</b>
Implemented Planning Consents	1,228	0	0	0	1,228
Previously Developed Land in the Existing Urban Area	0	820	1,129	1,023	2,972
Allocated Greenfield Sites	0	40	250	60	350
<b>Total</b>	<b>1,228</b>	<b>860</b>	<b>1,379</b>	<b>1,083</b>	<b>4,550</b>
<b>Requirement</b>	<b>1,400</b>	<b>1,000</b>	<b>1,000</b>	<b>1,600</b>	<b>5,000</b>
<b>Variance</b>	<b>-172</b>	<b>-140</b>	<b>+ 379</b>	<b>- 517</b>	<b>- 450</b>

The inclusion of Greenfield land increases the five year supply of deliverable sites in Castle Point because of the additional 40 units at Scrub Lane. However, there remains a requirement to supplement the five year supply in order to make up for the deficit in the period 2001-2008.

The inclusion of the Kiln Road site has a particular effect of reducing the deficit of the fifteen year supply; however, it does not address the deficit entirely. An overall deficit of 450 units remains, mainly occurring in the period beyond 2018. It is therefore necessary to consider the use of Green Belt land in delivering the Borough's housing requirements to 2023 and beyond.

## **Broad Locations**

The call for sites and earlier consultation on the Core Strategy resulted in 41 sites in the Green Belt being identified by landowners with the potential for future housing development. These sites had an overall capacity in excess of 7,000 dwelling units. This is far beyond the Borough's requirements in terms of housing and therefore it was necessary to consider the sustainability and deliverability of each site in turn in order to identify the best locations for future development.

The sustainability assessments are set out in the document entitled "Sustainability Assessment of Sites on the Urban Periphery" This identified sites that would make a positive contribution towards sustainability, would have a neutral effect on sustainability or would have a negative impact.

**Figure 17: Sustainability of Broad Locations**

<b>Impact on Sustainability</b>	<b>Number of Sites</b>	<b>Capacity</b>
Positive	8	1,134 – 1,620
Neutral	2	770 – 1,260
Negative	30	5,528 – 7,783
<b>TOTAL</b>	<b>40</b>	<b>7,432 – 10,663</b>

Given that the capacity of positive sites is in excess of the outstanding requirement for 2001-2026, it is not necessary to look beyond these for additional supply.

Each site was also assessed in terms of its impact on the function of the Green Belt, and its potential deliverability. The outcome of this work was the identification of four key sites with a capacity of at least 800 dwelling units. This is in excess of the outstanding requirement for 2001-2026 and provides flexibility to the supply.

The four identified sites on the urban periphery are:

**Figure 18: Capacity of Broad Locations**

<b>Site</b>	<b>Capacity</b>
East of Rayleigh Road	300
East of Canvey Road	400
West of Canvey Road (Frontage)	50
Rear of Castle View School	50
<b>Total</b>	<b>800</b>

The landowners of each of the two main sites (East of Rayleigh Road and East of Canvey Road) have been engaged in discussions with regard to the development of their land and the requirements for wider community benefits. With the exception of the site to the East of Canvey Road, which has the potential to deliver a number of wider community benefits on site, the sites are not required, and in most cases not deliverable during the early part of the plan period. The development of the site East of Canvey Road in the period 2008-2013 also provides a supply to meet Canvey Island's needs in the short term, which would otherwise be adversely affected by a lack of available housing land.

The temporal distribution of delivery of broad locations is expected to be as follows:

**Figure 19: Temporal Distribution of the Broad Locations Capacity**

	<b>2008 – 2013</b>	<b>2013 – 2018</b>	<b>2018 – 2026</b>	<b>Total</b>
East of Rayleigh Road	0	0	300	300
East of Canvey Road	100	250	50	400
West of Canvey Road (Frontage)	0	0	50	50
Rear of Castle View School	0	0	50	50
<b>Total</b>	<b>100</b>	<b>250</b>	<b>450</b>	<b>800</b>

The implications of the inclusion of these four additional broad locations within the housing land supply are considered in the overall housing trajectory that follows.

## **Overall Housing Land Capacity including Broad Locations**

Housing trajectories set out earlier in this report demonstrate that there is insufficient housing land in Castle Point to meet the Borough's housing land requirement. To this end, broad locations have been considered, and a potential supply from beyond the existing urban area identified.

The result of including these broad locations on the housing land supply in Castle Point is as follows:

**Figure 20: Overall Housing Capacity (exc. Windfall)**

<b>Source of Housing Land</b>	<b>2001 - 2008</b>	<b>2008 – 2013</b>	<b>2013 - 2018</b>	<b>2018 - 2026</b>	<b>Total</b>
Implemented Planning Consents	1,228	0	0	0	1,228
Previously Developed Land in the Existing Urban Area	0	820	1,129	1,023	2,972
Allocated Greenfield Sites	0	40	250	60	350
Broad Locations beyond the existing urban area	0	100	250	450	800
<b>Total</b>	<b>1,228</b>	<b>960</b>	<b>1,629</b>	<b>1,533</b>	<b>5,350</b>
<b>Requirement</b>	<b>1,400</b>	<b>1,000</b>	<b>1,000</b>	<b>1,600</b>	<b>5,000</b>
<b>Variance</b>	<b>-172</b>	<b>- 40</b>	<b>+ 629</b>	<b>- 67</b>	<b>+ 350</b>

The inclusion of 100 units of development on the urban periphery (East of Canvey Road) during the first five year ensures that there is almost a sufficient supply of land to ensure a five year supply between 2008 and 2013. A small increase in delivery above 100 units would entirely satisfy the requirement for a five year supply. It does not however remedy the deficiency in supply between 2001 and 2008. Further urban peripheral development is not considered necessary within the first five years.

However, the overall capacity to 2026 exceeds the requirement by 350 units. To this end, the urban peripheral locations identified for delivery in the period beyond 2018 (other than land East of Canvey Road) should be considered to be contingency sites, only to be released upon review of the Core Strategy to ensure that delivery stays on target. It may be the case that all or part of some sites are not required and could be reserved for housing development beyond 2026.

## Spatial Distribution of Housing Land Supply

As set out in the following section, Canvey is part of a different housing market compared to Benfleet, Hadleigh and Thundersley. As a result, it is important to consider how the Housing Land Supply is distributed between the two areas.

**Figure 21: Spatial Distribution of the Overall Housing Capacity**

Source of Supply	Benfleet, Hadleigh & Thundersley	Canvey Island	Total
Un-implemented Planning Consents	272	299	571
Urban Capacity Study (2004)	179	157	336
Main Routes Survey	440	318	758
Town Centre Regeneration	500	400	900
Employment Land Rejuvenation	200	175	375
Greenfield Sites	350	0	350
Broad Locations (Green Belt)	300	500	800
<b>Total</b>	<b>2,241</b>	<b>1,849</b>	<b>4,090</b>
<b>% of Total</b>	<b>54.8%</b>	<b>45.2%</b>	<b>100%</b>

The supply of housing land is broadly equally distributed between the two urban areas of Castle Point. The slightly larger provision on the mainland reflects the fact that this part of the Borough has a greater land area and thus potential to accommodate new homes. In both areas development is however constrained by a range of factors including nature conservation, flood risk and Green Belt designations.

## Windfall Allowance

The windfall allowance has been calculated by comparing planning permissions granted during the period 1<sup>st</sup> April 2004 and 31<sup>st</sup> March 2008 against sites identified in the Urban Capacity Study 2004.

During the period 1<sup>st</sup> April 2004 and 31<sup>st</sup> March 2008 permission was granted for 435 additional dwelling units. 156 units (36%) were on sites identified in the Urban Capacity Study 2004. The remaining 279 units (64%) were “non-UCS sites”. These sites were sub-divided between main routes, town centre regeneration areas and other sites.

Each figure was then annualised and a discount applied. To reflect the likelihood of housing coming forward from such sites in the future. The likelihood of such sites coming forward is low because the main sources of supply have been taken into account earlier in this report. The outcomes are set out below:

**Figure 22: Windfall Calculation**

	Main Routes	Town Centre Regeneration	Other Areas	TOTAL
a) Non – UCS Decisions 2004-2008	115	37	127	279
b) Annualised Non - UCS Decisions 2004 – 2008 (a/4)	29	9	32	70
c) Discount	80%	100%	50%	
d) Annual Windfall Allowance (b*c)	5.8	0	16	<b>21.8</b>

As set out in the methodology, this allowance will only be applied to the period beyond 2018 (after the first 10 years). Such an approach complies with the Practice Guidance referred to earlier. This creates an overall windfall allowance of **174** units for the period 2018-2026. This has the potential to reduce the need for urban peripheral development further.

## **Overall Housing Land Capacity including a Windfall Allowance**

Using identified sources of housing provision alone, it is necessary to use land on the urban periphery to supplement supply and ensure that there is enough land available to meet housing needs up until 2026. However, it is recognised that land may come forward from unidentified sources, improving the flexibility of supply and potentially reducing the need for land on the urban periphery during the period to 2026.

The result of including a windfall allowance on the housing land supply in Castle Point is as follows:

**Figure 23: Overall Housing Capacity (inc. Windfall)**

<b>Source of Housing Land</b>	<b>2001 - 2008</b>	<b>2008 - 2013</b>	<b>2013 – 2018</b>	<b>2018 - 2026</b>	<b>Total</b>
Implemented Planning Consents	1,228	0	0	0	1,228
Previously Developed Land in the Existing Urban Area	0	820	1,129	1,023	2,972
Allocated Greenfield Sites	0	40	250	60	350
Broad Locations beyond the existing urban area	0	100	250	450	800
Windfall Allowance	0	0	0	174	174
<b>Total</b>	<b>1,228</b>	<b>960</b>	<b>1,629</b>	<b>1,707</b>	<b>5,524</b>
<b>Requirement</b>	<b>1,400</b>	<b>1,000</b>	<b>1,000</b>	<b>1,600</b>	<b>5,000</b>
<b>Variance</b>	<b>-172</b>	<b>- 40</b>	<b>+ 629</b>	<b>+ 107</b>	<b>+ 524</b>

The inclusion of a windfall allowance has the effect of negating the need to deliver those urban peripheral sites identified in the period beyond 2018 other than the land East of Canvey Road. To this end, the urban peripheral locations identified for delivery in the period beyond 2018 could be considered to be contingency sites, only to be released where delivery is off target or beyond 2026.

## **Risks and Impact upon Capacity**

Inevitably there are a number of risks which could impact upon the results of this assessment. A prudent approach requires consideration of those risks and comments upon their impact upon capacity.

Three main categories of risks have been identified and these are as follows:

1. Risks related to the capacity assessment of sites
2. Assumptions relating to Urban Capacity Study and Main Route Survey non-response and the assumptions relating to windfall provision
3. Landowners changing perceptions regarding the delivery of sites.

These risks are identified as follows:

1. There will always be some difficulty in precisely identifying the capacity of individual sites since this will be affected by developers aspirations and intentions and changing market demand. Evidence from delivery of UCS sites identified in 2004 showed that these were generally developed to a higher density than the assessed capacity at that time. This will have also been influenced by other factors such as changes in government policy to maximise land use potential. However, as the number of UCS sites diminishes as a proportion of total sites this is considered to have a reducing importance.

The Main Route and Town Centre Sites have been assessed taking into account development capacities achieved in recent years on similar locations. It is therefore expected that these are more likely to reflect capacities that will come forward in due course.

2. The level of non response in relation to the UCS and Main Route consultations is significant. It is possible that the proportion of people who would not wish to see their sites developed is greater than in the responding population. However it is also likely that the control of those sites may well change during the plan period with new owners taking a different view from their predecessors. This will only become apparent through the monitoring of delivery in the plan period and reasons such as this justify the identification of contingency sites.
3. It is clear that many other considerations will influence owners perception regarding the delivery of sites. However, for the most part it is considered that this will effect the level of delivery within each of the time bands identified in the study rather than the capacity of the Borough as a whole. Some sites may well come forward earlier if the current occupiers no longer wish to pursue their current usage, while other sites could be postponed. These considerations will be monitored through the plan period.

## **Summary of Assessment Results**

The assessment demonstrates that:

- 1) There was an under-provision of 172 new dwelling units in the period 2001 – 2008 in relation to the requirements of the East of England Plan.
- 2) That there is a deficit of about 140 units in the indentified five year supply between April 2008 and March 2013 within the urban area.
- 3) The total shortfall in capacity between 2001 and 2013 is therefore 312 units.
- 4) The adoption of the Core Strategy and the development of land to the East of Canvey Road would reduce the deficit in the five year supply for 2008-2013 to about 40 units or eliminate it entirely if a higher rate of delivery there is achieved.
- 5) There remains a shortfall of delivery for the period 2001 to 2008 but this would be addressed by capacity coming forward in the period 2013 – 2018.
- 6) A moderate level of windfall would offset the need to rely on capacity coming forward from three of the broad locations identified (East of Rayleigh Road, North of Castle View School and West of Canvey Road) until after 2026. These sites could therefore be held back until after that date.
- 7) The availability of sites in Canvey is more restricted than on Benfleet, Hadleigh and Thundersley and consequently it may be necessary to bring forward land north of Castle View School and West of Canvey Road earlier than 2026 if required.
- 8) Canvey and Hadleigh Town Centres can make a significant contribution to housing supply. Although there may be some potential to develop individual sites in both town centres in advance of completion of the masterplanning work (e.g. Lookers or the fire station site in Hadleigh) this does not increase overall capacity from these locations since these sites are included in the overall capacity assessments of the town centres.
- 9) Reuse of former employment land for delivering housing capacity (e.g. the Point and Manor Trading Estate) will rely upon provision of alternative land including land in the Green Belt for these uses if employment levels are to be maintained.
- 10) This assessment includes assumptions regarding the delivery of UCS and Main Route sites where there was no response to the consultation. It is possible that the level of opposition to housing development on these sites may be greater than in the responding population. In which case the supply would be adversely affected.
- 11) There are also assumptions regarding discounting in the windfall allowance. A prudent approach has been taken with regard to this source of supply since it is clear that a significant reliance on windfall would be contrary to government guidance.

12) The borough has sufficient capacity to meet overall needs between 2001 and 2026 however this relies upon a very significant increase in the rate of delivery between 2013 and 2026 and the borough's Development Plan Documents being adopted within the timescales set out in the Local Development Scheme.

## **Implications of Other Policy Work**

The SHLAA has been prepared having regard solely to the availability of suitable land for development, with delivery based on the aspirations of landowners and physical constraints to development. However, other policy work is relevant to the supply of housing land in Castle Point and it is important that non-physical and policy constraints are also recognised as having the potential to affect the delivery of the housing land supply.

### **Strategic Housing Market Assessment**

The Council has been completing work on a Strategic Housing Market Assessment (SHMA) in partnership with other Thames Gateway South Essex Authorities. The final version is due for publication by the end of October 2008. The draft final SHMA has indicated some key issues that will affect housing delivery rates in the Borough:

- a) Canvey forms part of the Basildon housing market, whilst Benfleet, Hadleigh and Thundersley form part of the Southend housing market. This has implications for the distribution of homes throughout the Borough, with a need to identify a specific supply for Canvey Island separate to that of the mainland towns.
- b) In the short term the potential to maintain or improve rates of housing delivery may be curtailed by the current housing market and economic climate. This should however be used as an opportunity to complete plans for future housing delivery.
- c) Employment growth in East London and South Essex is likely to outstrip planned housing delivery. Delivery rates above and beyond targets set out in the East of England Plan may be required to accommodate employment growth in the sub-region. This has positive implications for medium to long term delivery rates in the Borough.
- d) Local authorities need to consider appropriate affordable housing policies in their areas in order to ensure that requirements do not harm delivery by making developments economically un-viable.
- e) The majority of household growth is expected to result from increasing single person households. However, many are existing older households who do not wish to downsize to one bedroom properties, preferring bungalows with gardens. This has implications for development densities. Despite this it is recommended that sub-urban locations should still achieve densities in the region of 30-40 dwelling units per hectare. Urban locations should achieve 60 dwelling units per hectare or more.

These issues, particularly a) and b) have implications for the housing trajectory with the five year supply of deliverable sites likely to be delayed in its delivery, particularly in the short term. However, depending on the timing of the predicted up-turn in the market, it may be possible to remain on target with regard to housing delivery, particularly if the medium to long-term effects of employment growth are realised.

In order to prevent issue d) having an impact it is important that economic viability is taken into account when assessing each individual application. Whilst a policy may set out the expected level of contribution from housing development proposals, it is

recognised that some sites may become un-viable if the policy is applied to its full extent. The Council is currently working with consultants to investigate the economic viability of housing developments in Castle Point to identify where constraints may exist.

Issue e) may have the effect of reducing development densities set out in the SHLAA. However, as different development densities have been applied depending on the location of each site identified, and those densities have been in line with the densities identified in the SHMA, it is considered that the effect would be minimal, particularly as the issue of flood risk, discussed below, prevents single storey developments such as bungalows being constructed in areas at risk of flooding.

### **Flood Risk**

A large part of the Borough's land area is at risk of Flooding, as identified by the Environment Agency's Flood Risk Maps. The area at risk of flooding includes the entire community on Canvey Island, and thus any housing sites in this community.

National Policy with regard to development and flood risk is set out in PPS25. This policy advocates a sequential approach to development, locating homes in areas that are not at risk of flooding first. However, it is accepted that there are exceptions to this, and as a result an exceptions test is also set out.

PPS25 requires local authorities to prepare Strategic Flood Risk Assessments to provide more detail to the Flood Risk Mapping of the Environment Agency. For Canvey Island, hazard maps have been prepared that separate out the area at risk of flooding into low, medium and high hazard areas based on the depth and speed of water expected in the event of a flood. These sites should be developed sequentially if development is permitted in the Flood Risk area.

The flood mapping prepared by the Environment Agency, does not take account of Flood Defences. However, the areas of Castle Point at risk of flooding are substantially protected by some of the best defences in England. Canvey Island has not flooded since these defences were erected after floods in the 1950's. As a result of these defences, a substantial size community has arisen, almost oblivious to the risk of flooding. Recent media attention of the issue has increased local awareness.

The community on Canvey Island is separate in identity to the communities in Benfleet, Hadleigh and Thundersley. As a result, it generates its own needs for housing and employment, identified in the SHMA. It also has regeneration requirements in respect of the Town Centre and Seafront. Therefore it is appropriate to seek to deliver a proportion of the Borough's housing requirements on Canvey Island, and apply the sequential test to the Island as a separate entity. The Environment Agency has indicated support for this position.

Given the growth and regeneration needs of Canvey Island, the Council is progressing towards getting the Core Strategy in place in order to address flooding issues in the longer term and deal with the sequential and exception tests set out in PPS25.

The Environment Agency however remains concerned with regard to the safety of residents in the event that a flood does occur due to a breach in the defences. The risk of a breach occurring has been assessed as being very unlikely. However, if a flood were to occur the effects would be significant. The Agency are seeking improvements to the emergency plans in place for the Island before further development can be permitted.

Emergency planners have only recently been engaged in the process and are having to develop capacity to deal with issues surrounding flood risk and development. As a result, planning applications for identified sites on Canvey Island have not received consent on Flood Risk grounds since late 2006. This has implications for the delivery of all identified development sites on Canvey Island without planning consent. Failure to resolve this issue in due course has implications for the Council in terms of delivering a 15 year supply of developable sites.

A proactive approach to addressing this issue has been taken by the planning authority in order to facilitate engagement of the Emergency Planners and the Environment Agency in reaching a solution. It is hoped that the matter can be resolved by the spring of 2009 in order to put application, extant consent and delivery levels back on track.

### **East of England Plan Review**

Work is currently underway on a review of the East of England Plan, with new district level housing targets being set for the period 2011-2031.

Currently housing growth scenarios are being tested at the County level, with the National Housing and Planning Unit suggesting that growth at 14%-41% above existing targets should be accommodated in the East of England. This may have implications for the amount of housing required in Castle Point, with the possibility that more homes will be required than the current East of England Plan target. The annualised requirement may increase.

This document will be used to demonstrate the difficulties faced in identifying sufficient land supply in Castle Point to accommodate further housing growth. However, should a target in excess of the current requirement be identified for the Borough, the review of the SHLAA in 2011 may need to be brought forward to ensure that the Council remains compliant with PPS3 in terms of identifying a 15 year supply of housing sites.

### **Other Issues**

Clearly a whole range of other policy issues restrict development levels in Castle Point. The planning authority continues to successfully resist new development in the Green Belt, and retains a strong Green Belt boundary.

The Borough is also rich in biodiversity and takes care to protect nationally protected and local wildlife sites from development, again restricting development potential or limiting the capacity of sites.

These issues largely only effect new development sites on the urban periphery, although some urban sites, particularly those that have been derelict or vacant for an extended period may experience issues with biodiversity in particular.

Issues surrounding private amenity have largely been built into the assessment by considering building lines and space standards when preparing the urban place supplement and considering areas of change. The town centre master plans and proposals for Greenfield Sites and broad locations in the Green Belt will respect these standards in their production.

## Conclusion

The Strategic Housing Land Availability Assessment (SHLAA) has successfully identified a sufficient supply of housing land to meet housing needs in Castle Point up until 2026. This includes the identification of a potential 5 year supply of deliverable sites.

However, it has not been possible to find a potential sufficient supply on previously developed land within the existing urban area. It has been necessary to include allocated Greenfield Sites in the supply and sites in the Green Belt that have yet to be allocated, largely as a contingency for later in the plan period and beyond.

This has implications in two respects. Firstly, PPS3 is clear that local authorities should strive to deliver over 60% of new dwellings on previously developed land. The inclusion of Greenfield sites and undeveloped Green Belt sites in the supply has the potential to reduce the proportion of new homes provided on previously developed land. The Council therefore needs to monitor this situation carefully in order to ensure that the national target is achieved in Castle Point. Failure to achieve this target has implications for sustainability.

Secondly, sites in the Green Belt that have yet to be allocated for development are covered by national policy set out in PPG2. PPG2 sets out a presumption against development in the Green Belt. As a result, policy intervention is required in order to remove the Green Belt allocation from these locations if they are to be deliverable. It is recognised that the removal of land from the Green Belt for development purposes is undesirable and in line with Government guidance should only occur as a last resort. However, the SHLAA has robustly demonstrated that such removals are necessary over the plan period if the Borough is to meet its housing needs.

Failure to identify a sufficient housing land supply may see developers submit applications for sites in the Green Belt, which could be allowed on appeal. This document may be used to demonstrate a requirement for Green Belt development. The current downturn in the housing market provides the Council with the opportunity to prepare robust plans for the future free from the urgent needs of the development sector.

Preparing plans carefully now will ensure a robust and constant supply of housing sites in Castle Point throughout the plan period to meet demand expected to be generated by employment growth.

It is important that the policies put in place with regard to housing mix and tenure do not constrain this growth and make sites economically un-viable to develop. This can be achieved by having accurate and up to date advice from the district valuer, although developers will also need to engage in a transparent and open fashion with the Council.

The current downturn in the housing market also provides the Council with the opportunity to facilitate co-operation between the emergency planners and the Environment Agency in order to resolve issues associated with flood risk. Failure to resolve these issues would have implications for housing land supply that could not be

reasonably resolved without seeking a proportion of development on Greenfield land in excess of the national target.

## **An Action List for ensuring a Sufficient Housing Land Supply**

Given the issues associated with ensuring that the supply of sites is delivered during the plan period, it is necessary to set out the following action list:

- 1) Take a proactive approach to urban regeneration and renewal, with the Council actively engaging with developers in order to make the best use of land and identifying barriers to delivery before they become an issue;
- 2) Ensure that Councillors are involved in the Master Planning processes for the Town Centres so that a proactive and decisive approach can be taken with regard to their regeneration;
- 3) Take a proactive approach with regard to those Greenfield sites already allocated for development in order to ensure that they are delivered in a timely manner;
- 4) Take a proactive approach to the preparation of the Core Strategy in order to ensure that the Council is able to control the need for development on the urban periphery by selecting the best locations and allocating them for development. This will ensure that the findings of the SHLAA are not used to force un-supported locations;
- 5) Identify locations where it may be necessary to use Compulsory Purchase Powers to enable housing delivery, and ensure Councillors are well briefed in the implications of not taking the required action on local housing supply;
- 6) Gather information on local land values and economic viability from the district valuer in order to prevent policies on affordable housing making developments un-economically viable. This will help to ensure good levels of delivery.
- 7) Facilitate engagement between the Environment Agency and the emergency planners in order to resolve delivery issues in the Canvey Island sub-market.
- 8) Monitor on an annual base housing delivery in order to assess progress and inform decision making with regard to the timely release of development sites on the urban periphery.
- 9) It is recommended that the SHLAA is refreshed in 2011 with a 1<sup>st</sup> April 2011 base in order to ensure that the Council is able to demonstrate a 15 year supply of developable sites as required by PPS3 on a continuous base. A refresh at this time will enable the Council to build in the requirements of the revision to the East of England Plan, provided that this Plan progresses as programmed.