



CASTLE POINT PLAN 2026 to 2043

CASTLE POINT BOROUGH COUNCIL HEARING STATEMENT

MATTER 1 – HOUSING REQUIREMENT AND PROVISION

JULY 2026



- Q1 Is the plan's housing requirement figure of 6,196 over the plan period, set out in Strategic Policy SP3, positively prepared, justified and consistent with national policy and in particular do any adverse impacts of providing for all or more of the area's objectively assessed housing needs (11,662 dwellings over the plan period calculated using the Standard Method) significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole?**

Introduction

- 1.1 The Council considers that the housing requirement of 6,196 homes set out in the Strategic Policy SP3 is positively prepared, justified and consistent with national policy. The requirement represents the maximum scale of growth that can be sustainably accommodated within Castle Point having regard to the National Planning Policy Framework (NPPF), the evidence base and the Borough's significant environmental, and infrastructure constraints.
- 1.2 The Council agrees that, applying the Government's Standard Method indicates a housing requirement of 11,662 homes over the plan period. However, the Framework is clear that plan making is not an exercise in applying the Standard Method in isolation. Rather, paragraph 3 confirms that the Framework should be read as a whole, and the preparation of a sound Local Plan requires the consideration of the environmental, social and economic objectives of sustainable development. The housing requirement must therefore reflect not only the identified level of need, but also the extent to which that need can be accommodated sustainably having regard to the Framework as a whole.
- 1.3 In this regard the administrative area of Castle Point Borough Council presents an exceptional combination of constraints. It is one of the smallest and most densely populated local authority areas in England. More than half of the Borough lies within the Green Belt, substantial areas are affected by tidal and surface water flood risk, whilst nationally and internationally important ecological designations extend across significant parts of the Borough, and the transport network already experiences severe congestion. The degree to which these considerations present as development constraints have been carefully and comprehensively challenged throughout the Plan's preparation, and in its supporting evidence base.
- 1.4 In this context the Council has taken a proactive approach to maximising housing delivery. It has undertaken two 'Call for Sites' exercises and assessed all of the sites promoted; prepared a Density and Capacity Study July 2025 [\[11.01\]](#) to optimise development opportunities within the urban area, assessed brownfield redevelopment opportunities; reviewed Green Belt boundaries; examined potential Grey Belt land; tested strategic growth options; and, prepared extensive supporting evidence relating to transport, infrastructure, flood risk, biodiversity and landscape. The resulting development strategy represents the maximum level of development that can be accommodated sustainably.
- 1.5 The Council therefore considers that the appropriate question is, having correctly adopted the Standard Method calculation as the starting point, whether the evidence demonstrates that meeting the full Standard Method housing figure, or indeed any material figure greater than that currently proposed in the Castle Point Plan, would result in adverse impacts that significantly and demonstrably outweigh the benefits when assessed against the policies of the Framework taken as a whole.
- 1.6 The Council's evidence demonstrates that the Standard Method housing figure, or any figure materially greater than that proposed in the Castle Point Plan would result in such adverse impacts. It is on this basis that the Council maintains that the correct, policy compliant housing provision figure which should be incorporated in the Plan is 6,196 homes (or 364 homes per annum).

Section 1 – Why 6,196 homes is an appropriate requirement in Castle Point

The Standard Method

- 1.7 The Council has prepared the Castle Point Plan in accordance with paragraph 62 of the NPPF and the Planning Practice Guidance (PPG) by applying the Government's Standard Method as the starting point for assessing housing need.

- 1.8 It is important, however, to recognise the evolution of the Standard Method during the preparation of the Plan.
- 1.9 When the plan preparation commenced in 2023, the Standard Method generated a requirement of approximately 350 dwellings per annum. At that time, the PPG also recognised circumstances in which departures from the Standard Method might be justified.
- 1.10 It was in this context, that one of the first technical studies commissioned by the Council was the Local Housing Needs Assessment 2023 [\[10.01\]](#). That assessment considered demographic projections and Census information. It concluded that the Borough's demographic need was 255 homes per annum over the 20 year period from 2023 to 2043 [\[10.01\]](#), page 7, figure 1] in Castle Point.
- 1.11 The publication of the revised NPPF in December 2024 fundamentally altered both the calculation and policy approach to the application of the Standard Method. In this regard, the calculation no longer relied principally upon demographic projections, but instead applied an affordability-led formula to the existing housing stock. For Castle Point this resulted in the standard method calculation of housing need doubling from approximately 350 homes per year to approximately 700 homes per year.
- 1.12 The Council agrees that this revised Standard Method forms the basis for assessing housing need for plan-making purposes as required by paragraph 62 of the NPPF. However, the change is material because it demonstrates that the increase does not arise from any corresponding change in the Borough's demographic characteristics or objectively evidenced household growth. Rather, it reflects the operation of a revised national methodology designed to support the Government's wider ambition of delivering 1.5 million homes across the country in the period to 2029.
- 1.13 Paragraph 62 of the NPPF December 2024 requires a housing needs assessment to be undertaken using the revised standard method. To align with this requirement, the Council commissioned an assessment of the impact of the revised Standard Method on the Housing Needs Assessment in 2023. As demography is not the starting point for the standard method, this work was undertaken to determine the demographic outcomes of the revised Standard Method to assess the likely housing mix requirements that would arise. This work concluded that approximately 7,800 additional households would be expected to form over the Plan period, equivalent to around 459 households per annum, if the standard method level of housing is applied in Castle Point. Beyond this, it is necessary to assume that there would need to be significant levels of new household formation amongst people who do not normally form new households (an artificial adjustment) in order to fill the remaining homes required under the standard method. This suggest that the housing requirement arising from the standard method outstrips the need arising from local people for homes.
- 1.14 Whilst the Council recognises that the Standard Method is not intended to be a demographic forecast, this evidence is nevertheless important. It demonstrates that the scale of development generated by the revised methodology substantially exceeds the level of household growth expected to arise from the Borough's demographic profile.
- 1.15 That distinction is important because it explains why the environmental and infrastructure consequences of pursuing the full Standard Method are particularly acute in Castle Point. The issue before the examination is therefore not whether the Standard Method should be 'ignored', but whether, in the circumstances of this Borough, the Framework requires all of that assessed need to be translated into a housing requirement irrespective of the significant environmental and infrastructure constraints that have been identified.
- 1.16 The Council's view is that it does not.
- 1.17 Instead, the Framework requires all relevant policies to be considered together. The Standard Method establishes the starting point for assessing housing need. It does not remove the requirement to consider whether meeting that level of need would result in unacceptable impacts on Green Belt purposes, biodiversity, flood risk, transport capacity, infrastructure provision and other matters to which the Framework affords substantial weight.

The Spatial Strategy in the Castle Point Plan

- 1.18 In preparing the spatial strategy, the Council has sought to deliver sustainable development in accordance with paragraphs 7 and 8 of the NPPF. The strategy recognises the need to provide homes whilst protecting the Borough's environmental assets and ensuring that development is supported by appropriate infrastructure.
- 1.19 The preparation of the spatial strategy has been informed by the South Essex Strategic Green and Blue Infrastructure Study July 2020 [\[6.06\]](#) and [\[6.07\]](#), the Castle Point Green and Blue Infrastructure Strategy Update July 2025 [\[6.08\]](#), [\[6.09\]](#) and [\[6.10\]](#), and the Essex Local Nature Recovery Strategy May 2025 [\[6.18\]](#), [\[6.19\]](#) and [\[6.20\]](#). These documents have informed the Council's understanding of the Borough's environmental assets and the opportunities and constraints that they present for future development.
- 1.20 Given Castle Point's limited land availability, high population density and significant environmental constraints, the spatial strategy has focused on making the most effective use of existing urban areas, before considering development on undeveloped land. It should be noted that the Borough of Castle Point is only 17 square miles (45 square kilometres) in size and has an existing population density of 2,005 people per square kilometre (compared to a national population density of 434 people per square kilometre). These characteristics significantly limit opportunities for outward expansion and reinforce the need to optimise the capacity of the urban area.
- 1.21 Policies SP1 and SP2 of the Castle Point Plan, establish an approach which prioritises the regeneration of sustainable locations, protects important green infrastructure and directs growth towards areas with the greatest access to services and transport.
- 1.22 This approach reflects national policy on the effective use of land. Paragraph 125 of the NPPF requires planning policies to promote the effective use of land in meeting the need for homes whilst safeguarding and improving the environment and ensuring safe and healthy living conditions. It also requires policies to make as much use as possible of previously developed land and support the optimisation of density in appropriate locations.
- 1.23 The Council has therefore:
- prioritised brownfield redevelopment opportunities
 - promoted regeneration within towns centres and employment areas
 - assessed opportunities for increased densities in sustainable locations
 - sought to optimise the capacity of the existing urban area before considering development of undeveloped land
- 1.24 To support this approach, the Council prepared a Density and Capacity Study July 2025 [\[11.01\]](#). This study examined capacity of different locations within the Borough and established appropriate density requirements reflecting their character, accessibility and sustainability of each area.
- 1.25 The densities identified through the study (and set out on page 23 of the Castle Point Plan [\[1.01\]](#)), and repeated below for ease of reference are:

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

Table 1: Area Density Types

- 1.26 Through this evidence-led approach, the Council has identified capacity for approximately 6,196 homes within the urban area. Growth has been directed towards locations where it can best support sustainable patterns of development whilst protecting the Green Belt, ecological assets, landscape character and heritage assets.

Consideration of Alternative Growth Options

- 1.27 The Council has undertaken extensive work to consider whether additional growth beyond 6,196 homes could reasonably be accommodated sustainably.
- 1.28 As part of the preparation, two Call for Sites exercises were undertaken during preparation of the Castle Point Plan, between February and March 2024 and July and September 2024. All sites promoted, including sites located in the Green Belt, were assessed through the Strategic Land Availability Assessment July 2025 [10.11, 10.12, 10.13] and considered through the Sustainability Appraisal process.
- 1.29 The Council also undertook a comprehensive Green Belt Assessment July 2025 [7.02 and 7.03] to establish whether land currently within the Green Belt could contribute towards meeting housing need without fundamentally undermining the Green Belt purposes or causing adverse impacts to other environmental, infrastructure and sustainability objectives.
- 1.30 As a result of this work, a range of growth options were tested thoroughly through the Sustainability Appraisal July 2025 [1.16, pages 126 to 151]. These represented a graduated approach from the Council's preferred strategy to the full Standard Method requirement.
- 1.31 Based upon the findings of the Green Belt Assessment July 2025 [7.02], two intermediate options were assessed comprising different levels of potential development in the Green Belt.
- 1.32 The levels of growth tested were as follows:

Option 1: Castle Point Plan preferred policy: Urban capacity (6,196 homes)

Option 2a: Urban capacity plus five strategic Grey Belt sites – 7,519 homes

Option 2b: Urban capacity plus ten strategic sites identified through the Green Belt Assessment – 8,845 homes

Option 3: National Standard Method requirement - 11,662 homes

- 1.33 The Sustainability Appraisal concluded that each of the higher growth options (scenarios 2a, 2b and 3) would result in less favourable sustainability outcomes than the Council's preferred strategy.
- 1.34 The Council also considered the potential for a strategic growth option at North West Thundersley. This option was assessed through the Sustainability Appraisal and the supporting transport evidence [9.31]. Whilst it received some community support, the evidence identified significant constraints,

including impacts on the strategic highway network, particularly A127/A130 junction, together with the need for extensive joint working with neighbouring authorities and Essex County Council.

- 1.35 A subsequent site-specific Statement of Common Ground with Essex County Council in August 2025 [12.01] confirms that the necessary transport mitigation and strategic coordination required to deliver this option cannot reasonably be achieved within the Plan period, in the context of the transport evidence. It also confirms that engagement with Essex County Council, Basildon Borough Council, Rochford District Council and other South Essex authorities would be required to bring forward such a proposal due to the need for comprehensive master planning, strategic highway improvements and cooperation across administrative boundaries.
- 1.36 Accordingly, the Council does not consider North West Thundersley to represent a reasonable or deliverable alternative capable of contributing to the housing requirement within the plan period.
- 1.37 Therefore, the Council has approached housing delivery positively and proactively. It has applied the Standard Method as a starting point for assessing housing need, undertaken extensive evidence gathering, maximised urban capacity, optimised densities, assessed Green Belt and Grey Belt opportunities, and tested all reasonable alternative growth scenarios.
- 1.38 The evidence demonstrates that 6,196 homes represent the maximum level of housing growth that can be accommodated sustainably within Castle Point.
- 1.39 The Council accepts that there are some benefits associated with delivering additional housing, including increased housing supply and affordable housing provision. However, the evidence demonstrates that providing for the full Standard Method requirement of 11,662 homes, or materially higher levels of growth than proposed in the Plan, would result in significant adverse impacts relating to Green Belt purposes, biodiversity, flood risk, landscape, transport and infrastructure capacity.
- 1.40 When assessed against the policies of the Framework taken as a whole, the Council concludes that those adverse impacts would significantly and demonstrably outweigh the additional benefits of higher growth.
- 1.41 Strategic Policy SP3 is therefore positively prepared, justified, and consistent with national policy.

Section 2 – Why higher growth cannot be accommodated

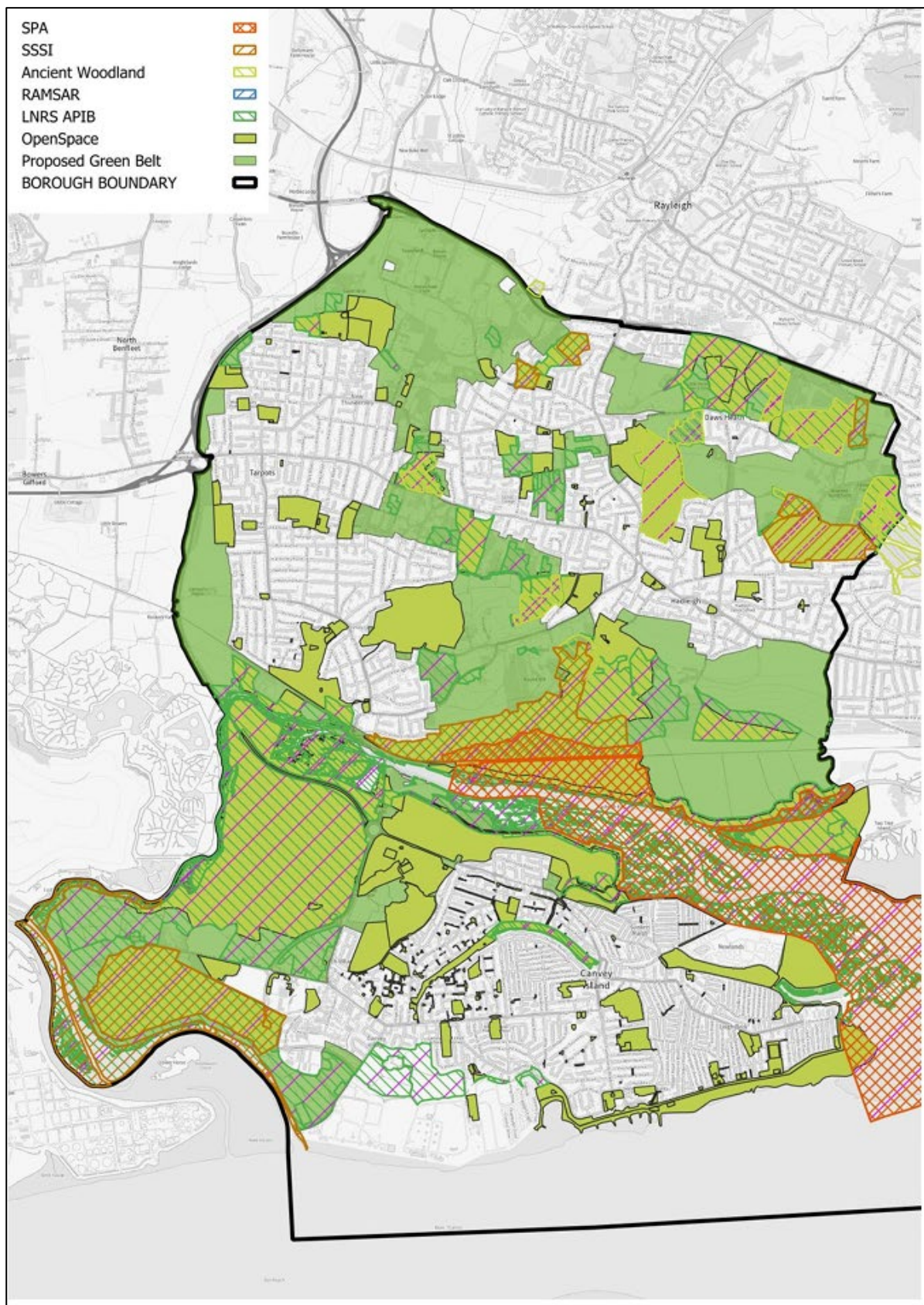
- 1.42 Section 1 of this response explains why the Council considers that 6,196 homes represent an appropriate housing requirement for the Castle Point Plan. It demonstrates that the Council has applied the Standard Method as the starting point for assessing housing need, maximised opportunities within the existing urban area, considered opportunities for additional development, and tested reasonable alternatives through the Sustainability Appraisal process. This section provides further detail on the specific constraints that limit the ability of Castle Point to accommodate higher levels of growth. These constraints are not considered in isolation. Rather, it is the combination of environmental, infrastructure and delivery constraints that determines the sustainable capacity of the Borough.
- 1.43 The Council recognises that no single constraint necessarily precludes development in every individual location. However, the evidence demonstrates that the cumulative effect of these constraints significantly restricts the amount, location and form of development that can be accommodated without causing unacceptable harm.
- 1.44 In this regard, and by way of overarching comment, higher levels of growth would require development in locations where one or more of the following issues arise:
- harm to Green Belt purposes
 - impacts on nationally and internationally important ecological assets
 - loss of important green infrastructure and habitat networks
 - increased exposure to flood risk and loss of flood storage capacity
 - unacceptable impacts on already constrained transport networks

- additional infrastructure requirements which create significant delivery and funding challenges

- 1.45 These matters have informed the Council's conclusion that 6,196 homes represent the maximum level of growth that can be accommodated sustainably within Castle Point.
- 1.46 The Council's conclusion is therefore not based upon a single policy constraint, or grounded in any 'in principle' presumption against growth. Rather, it reflects a balanced assessment of the benefits of additional housing delivery, as set against the cumulative environmental constraints with which the Council must consider. The following sections consider those constraints in turn.

Green Belt and land availability

- 1.47 The availability of land is a fundamental constraint on development capacity in Castle Point. The existing urban area is tightly enclosed by the Green Belt, which performs an important role in maintaining separation between settlements, preventing urban sprawl and protecting the openness of undeveloped land.
- 1.48 The Green Belt in Castle Point extends to 2,500ha and comprises 55.9% of the Borough's land area. Consequently, opportunities for outward expansion are inherently limited and any significant increase above the urban capacity identified in the Plan would require consideration of Green Belt release. The Green Belt Assessment July 2025 [\[7.02\]](#), page 5, paragraph 2.1] sets out that the Castle Point Green Belt is part of a wider network of Green Belt across South Essex and has been largely effective in maintaining the separation of towns in South Essex and Castle Point.
- 1.49 Consistent with paragraph 145 of the NPPF, the Council has not treated Green Belt designation as an absolute barrier to meeting housing need and the Council has undertaken a Green Belt Assessment to identify whether exceptional circumstances exist and whether land could be released from the Green Belt through the Plan making process to enable development. This approach reflects the Council's proactive approach to exploring opportunities for additional housing delivery.
- 1.50 However, the evidence demonstrates that Green Belt land is a significant constraint on higher levels of growth. There is a significant overlap between the Green Belt land in Castle Point and other nationally important constraints identified through footnote 7 of the NPPF. These include:
- The Benfleet and Southend Marshes SPA and Ramsar site (Habitats site)
 - Six Sites of Special Scientific Interest
 - 105ha of ancient woodland (irreplaceable habitat)
 - Areas of land falling within Flood Risk Zone 3b
 - Areas of land falling outside the tidal flood defences
 - Six scheduled monuments (setting addressed separately)
- 1.51 These constraints overlap across approximately 795.2ha of Green Belt land, representing around **31.8%** of the Green Belt within Castle Point.
- 1.52 In addition, a further 699.9ha of Green Belt land is designated and managed as accessible natural green space, or other open space provision. This represents a further **28%** of the Borough's Green Belt.
- 1.53 This is set out in the Housing Capacity Topic Paper August 2025 [\[7.09\]](#), page 31] and is shown below for reference.



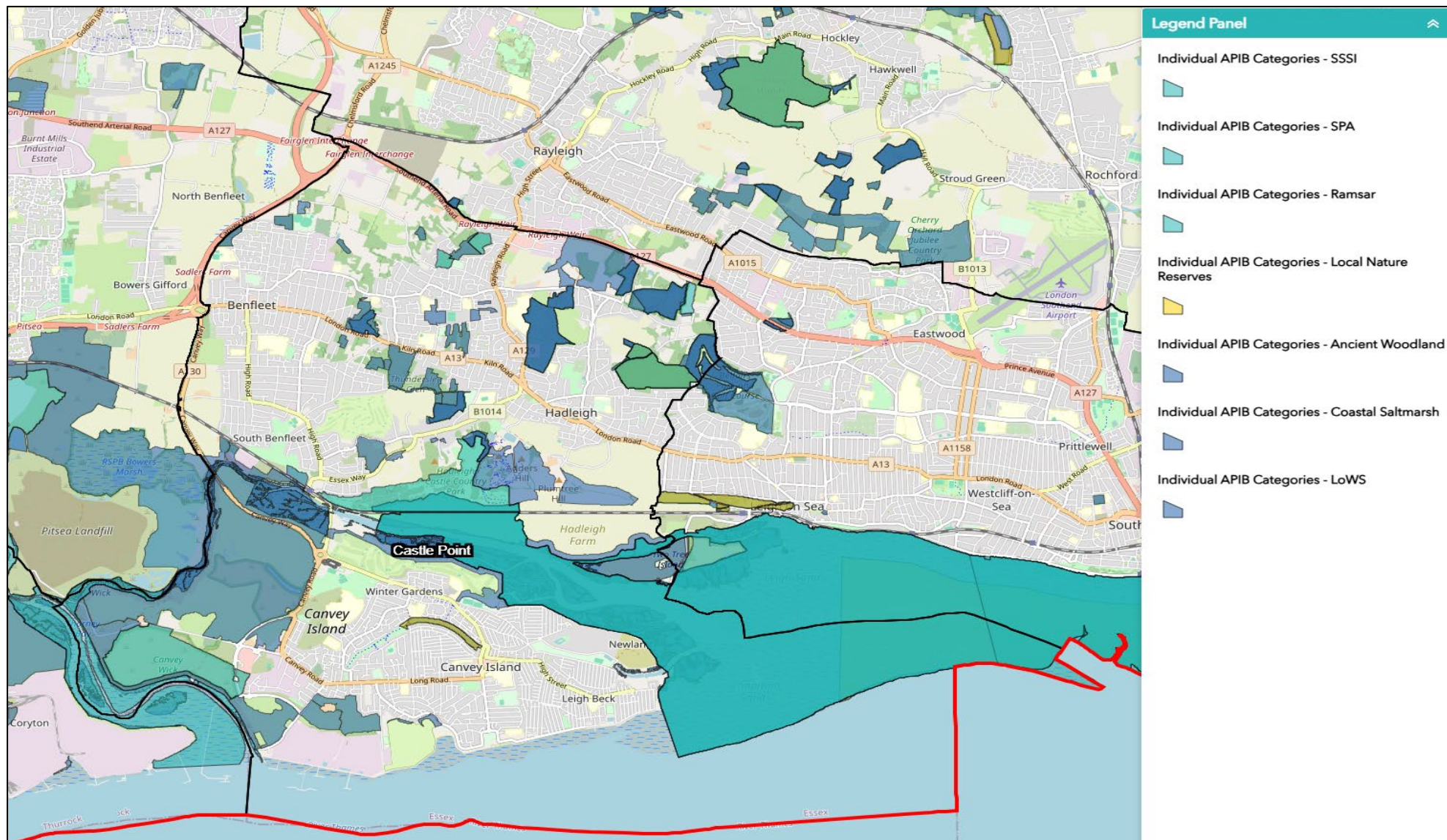
Map 1: Green Belt affected by footnote 7 constraints, open space and LNRS [Housing Capacity Topic Paper, [7.09](#) page 31]

- 1.54 Paragraph 104 of the NPPF confirms that existing open space, sports and recreational land should not be built upon unless it is surplus to requirements or replacement provision of equivalent or better quality can be secured. The Council's Open Space Assessment 2023 [\[8.13\]](#), page 95] concludes that existing open space provision should be protected and no open space land should be treated as surplus to requirements. No material option of replacement open space (of equivalent or better quality) has been identified.
- 1.55 Accordingly, before consideration is given to Green Belt purposes themselves, a substantial proportion of Green Belt land (circa **60%**) is affected by other policy constraints which significantly limit its suitability for development.
- 1.56 This demonstrates that the 'pool' of land suitable for further assessment for potential development is already significantly constrained.
- 1.57 The NPPF recognises that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation and review of a plan.
- 1.58 Paragraph 146 details what may constitute exceptional circumstances, and the balance that should be struck between meeting need and ensuring that the fundamental purposes of including land within the Green Belt, when taken together, are not undermined. Unmet housing need is specifically identified as an instance where exceptional circumstances will exist, (subject to other considerations).
- 1.59 To this end, consistent with the requirements of paragraph 146, and in order to proactively explore the potential to accommodate additional homes within the Borough, a Green Belt Assessment was undertaken.
- 1.60 The assessment builds upon the Green Belt Review Part One 2018 [\[7.01\]](#). Following the publication of the revised NPPF in December 2024, the Council commissioned an updated Green Belt Assessment, which was prepared in July 2025 [\[7.02\]](#) and [\[7.03\]](#) by DAC Planning.
- 1.61 The Green Belt Assessment July 2025 was prepared on a proportionate basis, and considered those sites that had been promoted to the Council for development purposes through the call for sites. Each site was assessed in terms of its impacts on purposes A, B and C of including land within the Green Belt. The combined assessment for these three purposes, i.e. when they are taken together, is set out in the table and map in section 5.4 of the Green Belt Assessment [\[7.02\]](#), pages 52 to 54, table 10 and figure 14].
- 1.62 The assessment demonstrates that the majority of the sites assessed as part of the Green Belt Assessment continue to perform one or more Green Belt purposes and that their release would result in material harm to the purposes of including land within the Green Belt.
- 1.63 The Council acknowledges that the Green Belt Assessment identified some locations as having potential Grey Belt characteristics or as warranting further consideration. Further consideration was given to such sites.
- 1.64 The Planning Practice Guidance [\[Reference ID: 64-010-20250225\]](#), Green Belt, paragraph 010] confirms that Grey Belt is not a designation that removes the need to assess whether development would be sustainable and appropriate having regard to all relevant policies.
- 1.65 The Council has, therefore, undertaken additional assessments of those sites identified for further consideration, particularly strategic sites capable of accommodating 100 or more homes. These assessments considered not only Green Belt matters but also accessibility, infrastructure requirements, environmental impacts and deliverability.
- 1.66 The outcome of this work is that material planning harm would arise if these sites were brought forward for development purposes.
- 1.67 Green Belt is a key constraint on higher growth in Castle Point. It is not the sole reason why the Standard Method figure (or indeed a figure greater than that currently proposed) cannot be met, but it

forms an important part of the cumulative evidence demonstrating that higher levels of growth would not represent sustainable development.

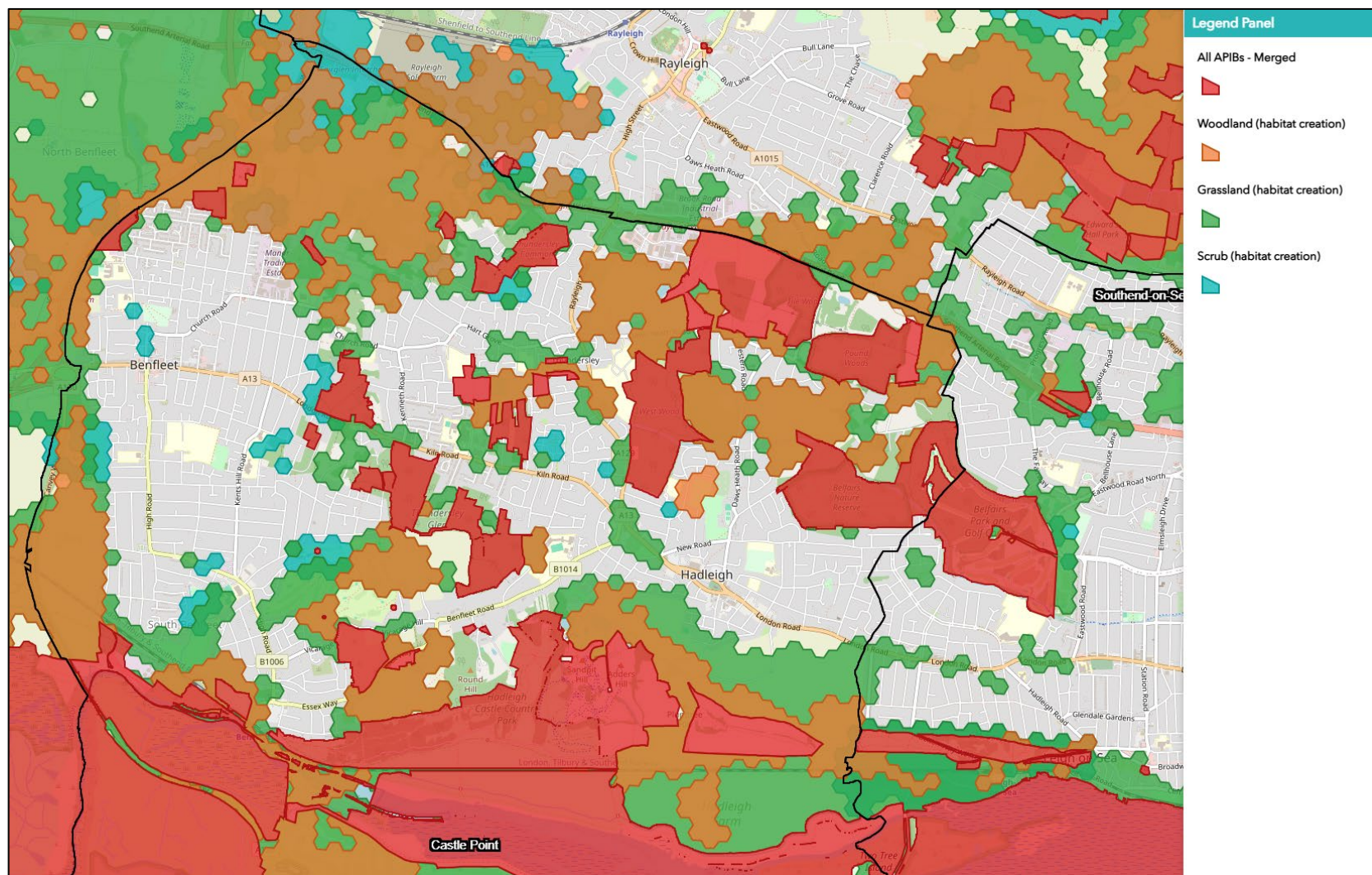
Environment and biodiversity

- 1.68 The natural environment is a significant constraint on development capacity in Castle Point. The Borough contains a network of internationally, nationally and locally important ecological assets which are protected through national policy and legislation.
- 1.69 The Benfleet and Southend Marshes Special Protection Area and Ramsar site, together with Sites of Special Scientific Interest and other designated habitats, represent areas of particular importance for biodiversity and provide a strong reason for limiting development where harm cannot be avoided or mitigated.
- 1.70 The NPPF provides strong protection for such sites. Paragraph 188 requires local planning authorities to take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure and to plan for the enhancement of natural capital at a catchment and landscape scale.
- 1.71 These internationally and nationally designated sites do not operate in isolation. They form part of a wider ecological network across Castle Point comprising Local Wildlife Sites in 2023 [[6.02](#) and [6.03](#)], potential Local Wildlife Sites and habitat corridors.
- 1.72 The Council's review of Local Wildlife Sites undertaken in 2023 identified an extensive network of locally important habitats. These sites, together with nationally and internationally designated areas, have informed the Local Nature Recovery Strategy mapping of Areas Particular of Importance for Biodiversity (APIBs). The map below shows the extent of this network.



Map 2: LNRS Designations for Castle Point and wider South Essex [LNRS Interactive Map, [6.21](#)]

- 1.73 The resulting evidence demonstrates that Castle Point contains a highly connected ecological network. Protecting this network is consistent with paragraph 192 of the NPPF, which requires plans to identify, map and safeguard:
- components of local wildlife-rich habitats
 - wider ecological networks
 - wildlife corridors
 - areas identified by national and local partnerships for habitat management, enhancement, restoration or creation.
- 1.74 It is therefore justified and consistent with (indeed required by) national policy that the Council has acted to safeguard those sites set out in the map above, but as a consequence there is a constraint on housing growth in the locations covered by wildlife designations.
- 1.75 Paragraph 192 also expects plans to promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gain.
- 1.76 As can be seen from the map below there are clusters of smaller APIBs around Thundersley and around Daws Heath. Policies THUN4 and DH1 seek to respond to the opportunity in those areas to better connect the network of habitats in those areas. This is a positive response to the Strategic Opportunity mapping undertaken for the LNRS, which provides evidence of those locations where habitat creation and enhancements will be most effective at securing nature recovery. It is consistent with (and indeed required by) the NPPF that development be limited/precluded where it would prevent these strategic opportunities for habitat connectivity from being achieved.

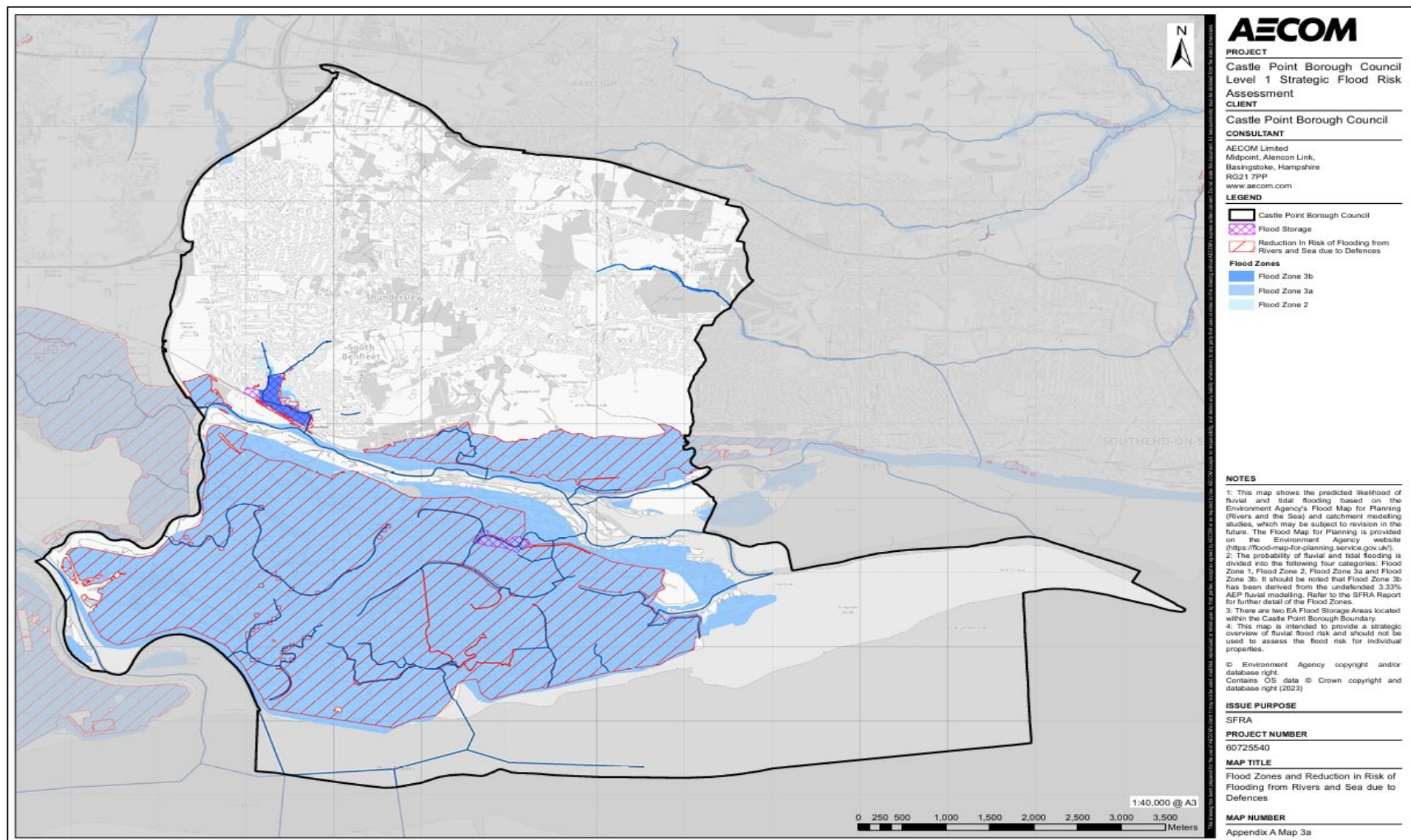


Map 3: LNRS APIBs on the mainland of Castle Point [LNRS Interactive Map, [6.21](#)]

- 1.77 In addition to the natural environment being important for habitats and wildlife, it also has a role to play in protecting the landscape and landscape features, geology, and some historical assets.
- 1.78 Landscape sensitivity is an important constraint. Castle Point comprises around 600ha of woodlands, including ancient and secondary woodland, the grassland escarpment to the South of Hadleigh and grazing marshes around Benfleet Creek, and across the western extent of Canvey Island.
- 1.79 Landscape sensitivity testing has been undertaken by the Council to determine the effects of potential development on the landscape and has identified areas of high landscape value that should be avoided [[7.04](#), [7.05](#) and [7.06](#)].
- 1.80 A small number of geological assets are identified in the Local Geological Sites Addendum March 2025 [[6.05](#)]. Heritage impact assessments have been undertaken for those heritage assets that may be impacted by potential development locations [[11.03](#), [11.04](#), [11.05](#) and [11.06](#)]. The extent of constraints in relation to these assets are largely localised in nature, with the exception of the setting of the Hadleigh Castle Scheduled Monument which is more extensive, and heightens landscape sensitivity in that location [Landscape Sensitivity Assessment November 2024, [7.05](#), page 52].
- 1.81 The Council has therefore taken a proactive approach to understanding and protecting the Borough's natural environment. The evidence demonstrates that biodiversity, landscape and associated environmental assets represent a significant constraint on higher levels of housing growth.
- 1.82 This is consistent with national policy and forms part of the cumulative justification for the housing requirement in Strategic Policy SP3.

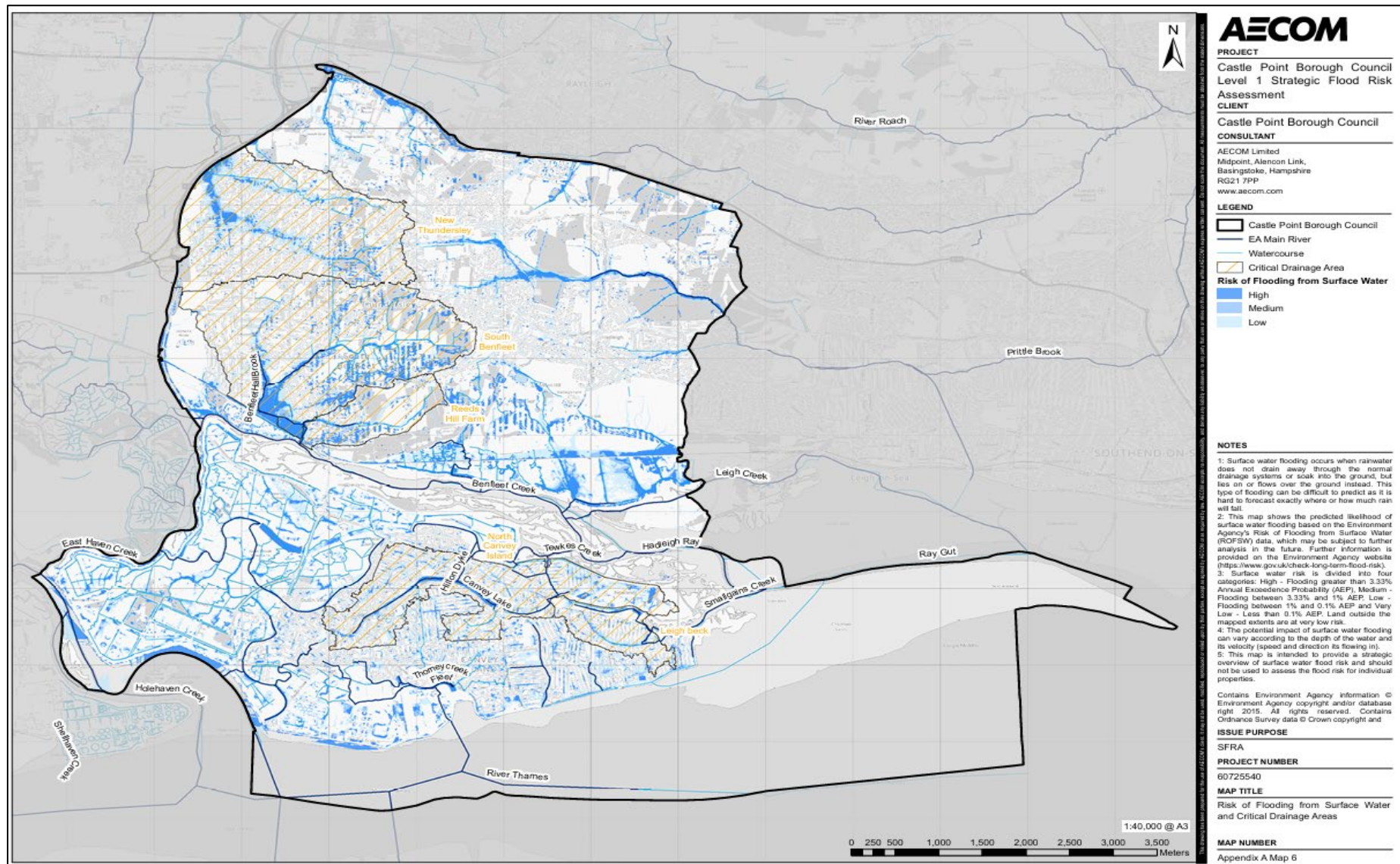
Flood risk

- 1.83 Flood risk is a significant issue in Castle Point, which serves to constrain development (including additional housing growth). Tidal flood risk affects around half the Borough's land area, as shown in the map extracted below from the SFRA appendix A [[4.05](#), page 4, map 3a). The likelihood of tidal flood risk is managed through sea defences and a barrier system. The Thames Estuary 2100 Plan 2023 [[4.01](#)] establishes that the sea defences on Canvey will be improved to keep up with climate change (policy P4). Some £75 million has recently been spent on replacing the sea wall revetment to ensure that the risk of tidal flooding is mitigated and the Thames Estuary 2100 Plan 2023 [[4.01](#)] proposes increasing the height of the wall to further protect Canvey Island. However, the sea defences to the north of Benfleet Creek in the area of the Benfleet and Southend Marshes will be retained at their current extent (policy P3) meaning that there is a risk of more frequent tidal flooding in that area in future years.



Map 4: Flood Zones and Reduction in Risk of Flooding from rivers and sea due to defences [Level 1 SFRA Appendix A 4.05, Map 3a, page4]

- 1.84 There are also significant risks associated with surface water across the entire Borough, as shown in the map extracted below from the SFRA appendix A [\[4.05, page 8, map 6\]](#). In recent years there have been surface water flooding events on Canvey in 2013 and 2014, and across the Borough in 2021. Mapping contained in Appendix E of the SFRA [\[4.09\]](#) shows the extent of this flood risk increasing with climate change.
- 1.85 When all sources of flood risk are considered, the result is a significant constraint on where housing can be accommodated in the Borough in line with the sequential test set out in the NPPF. However, it is recognised that the presence of sea defences, and appropriate design and layout of development can help to ensure that the exceptions test set out in the NPPF can be applied in most instances.
- 1.86 However, it is evident from the SFRA mapping shown below that the extent of surface water that accumulates across open land on Canvey Island is extensive. There is a network of drains that contain the surface water across this flat topography and direct it towards tidal and pumped outfalls, and away from the urban area.
- 1.87 There is a significant concern that development on open land to the west of Canvey especially will cause alterations to the topography and the drainage network on Canvey Island that will impact on the extent of surface water flooding in the existing urban area. The Canvey Six Point Plan 2015 [\[4.03\]](#) identifies the need for additional green storage space for surface water on Canvey Island, not less.
- 1.88 Paragraph 170 of the NPPF requires plans to direct development away from areas at highest risk of flooding and to ensure that where development is necessary it is safe for its lifetime and does not increase flood risk elsewhere. The Council considers that this policy is particularly relevant in Castle Point, where the interaction between tidal flooding, surface water flooding and climate change creates significant limitations on the amount of additional development that can be accommodated. The redevelopment of brownfield land can also contribute to reducing flood risk. Where redevelopment replaces areas of existing hardstanding, with green infrastructure (such as gardens and landscaped areas) there is an overall increase in permeable surfaces. This helps to mimic natural drainage processes, reducing the speed and volume of surface water run-off and improving water infiltration.
- 1.89 The evidence demonstrates that increasing the scale of development over and above that set out in the Plan, would place additional pressure on the Borough's flood management systems and reduce opportunities to improve climate resilience, particularly if development would remove existing open green spaces which currently forms part of the flood mitigation network. The Council acknowledges that developments must not increase overall flood risk, and the impact of the development must be mitigated, but this must be in areas which are not already impacted by other environmental constraints. Flood risk therefore represents a significant constraint on higher levels of housing growth.



Map 5: Risk of Flooding from Surface Water and Critical Drainage Areas [Level 1 SFRA Appendix A, [4.05](#), page 8]

Transport infrastructure capacity

- 1.90 Transport infrastructure represents a further, principal constraint on accommodating higher levels of housing growth in Castle Point.
- 1.91 It is anticipated – indeed inevitable – that housing growth will give rise to additional movements on the local transport networks. To this end work has been undertaken to manage the impact of growth on the local transport network. As a starting point, an initial transport scoping exercise [\[9.03\]](#) was undertaken in 2024 to understand the existing transport conditions across the area. From this an initial schedule of interventions was identified in order to improve local transport conditions across the Borough [\[9.03\]](#), pages 74 to 91].
- 1.92 The proposals in the Castle Point Plan were subject to a Transport Assessment. This considered the impact of these sites on the transport network (transport modelling) and their alignment with proposals on the initial schedule of intervention as referred to in paragraph 1.91. This improved the sustainability and funding potential for any such interventions taken forward as they were aligned to growth and not just supporting existing needs. Additional interventions were also identified through this process to support the allocation in the Plan. A revised schedule of interventions is included and costed in the report [\[9.03\]](#), pages 64 to 78].
- 1.93 The modelling shows that at 6,196 homes, with the mitigations applied, the traffic conditions will worsen in Castle Point when compared to the baseline case built using the South Essex Transport Model which formed part of the Transport Assessment. It is anticipated that there will be a significant increase in traffic flows for the following areas [Transport Assessment Update December 2025, [9.24](#), pages 100-102, figures 59 to 62]:
- A130 Canvey Way
 - A130 between Sadlers and Fairglen
 - A13 from Sadlers to Tarpots
 - Routes through Benfleet connecting Canvey to the A13 and to the A127 via the A129.
 - Sommes Avenue, Canvey Road and Long Road on Canvey
- 1.94 It is also anticipated that capacity will be exceeded at [\[9.24\]](#), pages 107-110, figures 71 to 78]:
- A130 Canvey Way
 - A13 between Sadlers Farm and Kents Hill Road
 - A129 between the Woodmans Arms and the Rayleigh Weir
 - Canvey Road/Long Road intersect
- 1.95 Whilst mitigation measures are identified in the Transport Assessment, it confirms that there are no funded proposals capable of providing the additional highway capacity necessary to accommodate materially higher levels of growth. In some locations, the physical constraints of the existing highway network also limit opportunities. In the case of the A13, the A129 and the Canvey Road/Long Road section of road, there is limited space within or adjacent to the highway to implement additional capacity improvements.
- 1.96 It is therefore clear that even at a plan figure of 6,196 homes there will be material impacts on the transport network in Castle Point. This has been explored having regard to business as usual and sustainable travel mode scenarios, and there is only modest relief provided under the sustainable travel scenario. This is in the circumstances where the Council has directed growth to its urban areas which are the most sustainable locations in terms of transport choice.
- 1.97 The Council has also assessed whether additional development on the urban periphery could provide more sustainable alternatives. Green Belt Site Access Assessments July 2025 [\[7.07\]](#) and [\[7.08\]](#) were prepared to consider site accessibility in line with paragraphs 110 and 115 of the NPPF.
- 1.98 Each site was tiered in terms of its location and the potential for a wider choice of transport modes to be used. Tier 1: 55% car usage; Tier 2: 65% car usage; and Tier 3: 70% car usage. Firstly, a significant number of the sites sat in Tiers 2 and 3, and would generate high levels of car usage which would

significantly worsen the traffic situation in Castle Point. Secondly, in most instances, the development would not contribute towards modal shift towards sustainable travel means i.e. the introduction of sustainable travel enhancements such as bike paths or travel hubs would not bring down car usage. To this end, all omission sites would further increase traffic flows within the Borough, with limited scope for bringing about sustainable travel improvements.

- 1.99 The evidence, which has been prepared in line with the NPPF, therefore indicates that transport capacity is a constraint on development in Castle Point and precludes the accommodation of housing growth above the level proposed in Strategic Policy SP3. It is expected that growth of 6,196 homes will already bring about material congestion on certain routes. Growth above this will exacerbate these conditions without providing any relief through sustainable travel enhancements.

Other infrastructure requirements

- 1.100 The availability and capacity of infrastructure is a further important consideration in assessing whether higher levels of growth can be accommodated sustainably within Castle Point.
- 1.101 The Infrastructure Delivery Plan May 2025 (IDP) [\[9.02\]](#) considered the infrastructure requirements arising from different levels of growth, including scenarios informed by early findings of the Green Belt Assessment July 2025 [\[7.02\]](#) and [\[7.03\]](#).
- 1.102 The IDP identified the following infrastructure costs associated with the different growth scenarios:
- Scenario 1, reflecting the Plan strategy, identified infrastructure requirements in the order of £64.122m, equivalent to approximately £11,958 per home.
 - Scenario 2, aligning with Sustainability Appraisal scenario 2a, identified infrastructure requirements of approximately £120.582m, equivalent to approximately £16,036 per home; and
 - Scenario 3, aligning with Sustainability Appraisal scenario 2b, identified infrastructure requirements of approximately £151.307m, equivalent to approximately £17,106 per home.
- 1.103 These figures demonstrate that higher growth scenarios create additional infrastructure demands and result increased costs per home.
- 1.104 The IDP shows that higher growth scenarios would require additional education infrastructure, including a new primary school in the Thundersley area and additional secondary school capacity. Under the highest growth scenario, further requirements including additional SEND provision would also arise. Whilst some education requirements may potentially be delivered through extensions to existing facilities, this cannot be guaranteed and would require further land and funding.
- 1.105 The IDP Addendum December 2025 updated the assessment of Scenario 1 to reflect the Plan's housing requirement position. Whilst this resulted in updated infrastructure costs, it did not alter the conclusion that higher growth scenarios generate additional infrastructure requirements and increased delivery challenges.
- 1.106 The issue is not that infrastructure improvements cannot be secured for any development. The Infrastructure Delivery Plan aligns with the growth proposed in the Plan, and identifies the infrastructure necessary to support the proposed growth. Rather, the IDP demonstrates that increasing the scale of growth beyond the Plan requirement, would place additional pressure on infrastructure capacity and create significant challenges in securing the necessary mitigation.
- 1.107 This is particularly important when considered alongside the other constraints identified above. Higher levels of housing growth would not only require additional land, but would also require additional schools, transport improvements, flood risk mitigation, open space provision and other supporting infrastructure in circumstances where delivery is already challenging.

- 1.108 Infrastructure capacity therefore represents a further significant constraint on accommodating higher levels of housing growth within Castle Point and forms part of the cumulative evidence supporting the housing requirement in Strategic Policy SP3.

Section 3 – the balance of benefits and adverse impacts

- 1.109 Having regard to the matters set out above, it is necessary to now explain how the adverse impacts of higher levels of growth significantly and demonstrably outweigh the benefits of pursuing such levels of growth in Castle Point, as required by paragraph 11b of the NPPF.

Benefit	Commentary	Weight
Delivering more homes	The application of the Standard Method indicated that there is a need to deliver more homes in Castle Point. However, the demographic analysis contained in the Local Housing Needs Assessments 2023 [10.01] and 2025 [10.02] , indicate that the level of growth planned for in the Plan is sufficient.	Significant
More affordable housing	The need for affordable housing over the plan period is around 1,458 homes [Local Housing Needs Assessment Update June 2025, 10.02 , page 9, figure 5.] It is estimated around 1,290 homes can be secured on Council owned land. Policy HOU2 seeks to secure the remaining provision on private sites however it is recognised that affordable housing is more viable on greenfield sites.	Significant
More family housing	The need for family housing makes up 57% of the potential demand for housing. However there is extensive provision of family housing and bungalows (approximately 80%) in the existing stock. The Plan does not prevent the redevelopment and extension of bungalows or other house types, allowing for more family homes within the existing stock.	Significant
Economic Growth	Demographic change is estimated to give rise to 3,877 additional economically active people over the plan period [Housing Needs Assessment 2023, 10.01 , page 73, paragraph 6.18]. Which exceeds the projected growth in local jobs of 2,700. The growth in the Plan already exceeds the need for workers in the local economy, supporting wider economic growth in South Essex.	Moderate

Table 2: Benefits of pursuing a high level of growth in Castle Point

Harm	Commentary	Weight
Harm to Green Belt purposes	Green Belt covers 55.9% of the Borough, and growth beyond 6,196 homes will cause harm to the purposes of including land in the Green Belt as detailed in the Green Belt Assessment July 2025 [7.02]	Significant

Harm to designated habitats	There is a significant network of internationally, nationally and locally designated sites in Castle Point. Development adversely affecting those sites would cause significant ecological harm in accordance with NPPF paragraph 192.	Significant
Loss of strategic opportunity sites for biodiversity enhancement.	The LNRS May 2025 [6.18, 6.19, 6.20 and 6.21] identifies strategic opportunity sites that would improve the network of habitats in and around Thundersley and Daws Heath.	Moderate overall, but some of the promoted Green Belt sites are also identified in the LNRS as APIBs
Landscape, geological and heritage harm	This harm is concentrated in specific locations, but is extensive and significant around the Hadleigh Castle Scheduled Monument.	Moderate overall
Flood risk	Flood risk is extensive and from multiple sources as set out in the SFRA [4.04 and 4.05] . Whilst tidal flood risk to the main urban areas is managed through defences, surface water flood risk remains an issue, and it is necessary to protect open land for flood storage reasons especially to the west of Canvey, and in Flood Risk Zone 3b (functional flood plain) in South Benfleet.	Significant
Transport Impacts	The Transport Assessment shows the impacts of 6,196 homes to be significant and material on parts of the network. Additional growth would cause further harm. No mitigation to this has been identified.	Significant
Infrastructure capacity	The Infrastructure Delivery Plan shows that the cost of infrastructure increases disproportionately for scenarios with higher number of homes. There is a potential for under delivery of infrastructure to arise as a consequence. This would be to the detriment of sustainable development and the wellbeing of residents.	Significant

Table 3: Harms of pursuing a high level of growth in Castle Point

- 1.110 The Council recognises that increased housing delivery would provide important benefits, including a greater supply of homes, additional affordable housing, a wider housing mix and economic benefits arising from population growth and increased labour supply.
- 1.111 These benefits have been given significant weight in preparing the Plan. As set out in Section 1, the Council has sought to maximise housing delivery through optimising development within the urban area, making best use of previously developed land, reviewing Green Belt and Grey Belt opportunities, testing strategic growth options and assessing all reasonable alternatives. This process led to the conclusion that 6,196 homes represents the appropriate housing requirement. The benefits of higher growth are summarised in Table 2.
- 1.112 The Council accepts that housing delivery above the Plan requirement would increase housing supply and affordable housing provision. However, these benefits must be balanced against the environmental, infrastructure and delivery impacts of accommodating additional growth within a highly constrained Borough.

- 1.113 The evidence demonstrates that materially higher levels of growth would require development in locations where significant adverse impacts would arise, including harm to Green Belt purposes, biodiversity, landscape character, flood risk, transport infrastructure and the capacity of supporting infrastructure. These impacts are summarised in Table 3.
- 1.114 The Council has considered these impacts both individually and cumulatively. The evidence shows that higher growth would require the release of additional Green Belt land and result in increasing pressure on environmentally constrained areas. It also demonstrates that the Plan's proposed level of growth already places significant pressure on the transport network, with no realistic mitigation identified for materially higher levels of growth. Similarly, the IDP identifies increasing infrastructure requirements, delivery challenges and funding pressures as growth increases.
- 1.115 The Council's analysis has not been directed by any single constraint in isolation. Rather, it is the cumulative effect of environmental, infrastructure and delivery constraints that defines the Borough's sustainable capacity for growth.
- 1.116 Having weighed the additional benefits of higher housing delivery against these cumulative impacts, the Council concludes that while the benefits of additional growth continue to increase, they do so at a diminishing rate, whereas the associated adverse impacts increase significantly.
- 1.117 Assessed against the policies of the Framework taken as a whole, the Council considers that the adverse impacts of providing for the full Standard Method housing need, or any materially higher level of growth than proposed in the Plan, would significantly and demonstrably outweigh the additional benefits.
- 1.118 Accordingly, the Council considers that a housing requirement of 6,196 homes achieves the appropriate balance between meeting housing needs and delivering sustainable development in accordance with the Framework.

Section 4 – Conclusion

- 1.119 The Council has prepared the Castle Point Plan positively and proactively, having regard to the requirement to meet identified housing needs whilst ensuring that development is sustainable and consistent with the Framework as a whole.
- 1.120 The Council has applied the Standard Method as the starting point for assessing housing need and has fully considered the implications of the Government's housing need methodology. However, the Standard Method figure cannot translate directly into the housing requirement for the Plan where the evidence demonstrates that doing so would result in significant adverse impacts which would outweigh the benefits of additional growth.
- 1.121 The Council has undertaken extensive evidence gathering to establish the Borough's capacity for sustainable development. This has included:
- maximising opportunities within the existing urban area;
 - preparing a Density and Capacity Study to optimise development opportunities;
 - undertaking Call for Sites exercises and assessing all promoted sites;
 - reviewing Green Belt boundaries and assessing potential Grey Belt opportunities;
 - testing alternative growth scenarios through the Sustainability Appraisal process; and
 - preparing comprehensive evidence relating to transport, infrastructure, flood risk, biodiversity, landscape and other environmental considerations.
- 1.122 This work demonstrates that the Council has not limited growth without proper assessment, and other than is absolutely necessary. Rather, it has sought to identify the maximum level of housing growth that can reasonably be accommodated within Castle Point having regard to the requirements of national policy.
- 1.123 The evidence demonstrates that the urban capacity identified through the Plan provides for 6,196 homes over the Plan period. This represents a significant contribution towards meeting housing needs

and has been achieved through a strategy which prioritises regeneration, brownfield redevelopment, sustainable locations and the efficient use of land.

- 1.124 The Council has also considered whether higher levels of growth could reasonably be accommodated. The evidence demonstrates that growth above the Plan requirement would require development in locations where significant cumulative impacts would arise, including:
- harm to Green Belt purposes;
 - impacts on important ecological networks and designated habitats;
 - increased pressure on areas affected by flood risk;
 - unacceptable impacts on an already constrained transport network; and
 - additional infrastructure requirements which create significant delivery and funding challenges.
- 1.125 These impacts have been assessed through the evidence base and Sustainability Appraisal and have been considered against the benefits associated with additional housing delivery.
- 1.126 The Council agrees that additional housing growth would provide benefits, and wishes to secure those benefits, including increased housing supply and the potential for additional affordable housing provision. However, those benefits must be considered in the context of the particular circumstances of Castle Point, including its limited land availability, high density, extensive environmental constraints and infrastructure capacity challenges.
- 1.127 Having considered the Framework as a whole, the Council concludes that the adverse impacts of meeting the full Standard Method housing requirement of 11,662 homes, or a materially higher level of growth than proposed in the Plan, would significantly and demonstrably outweigh the additional benefits.
- 1.128 The housing requirement of 6,196 homes therefore represents a sound and justified balance between meeting housing needs and delivering sustainable development.
- 1.129 Accordingly, the Council considers that Strategic Policy SP3 is:
- positively prepared, as it seeks to meet housing needs through a realistic and deliverable strategy informed by proportionate evidence;
 - justified, as it represents the appropriate balance between housing delivery and the environmental, social and infrastructure constraints identified within the evidence base; and
 - consistent with national policy, as it has been prepared having regard to the Framework’s objectives for achieving sustainable development.

2 Q1, part a) Do the constraints identified by the Council justify not allocating each of the sites for housing development recommended for further consideration by the DCA Green Belt Study, including sites which already have planning permission?

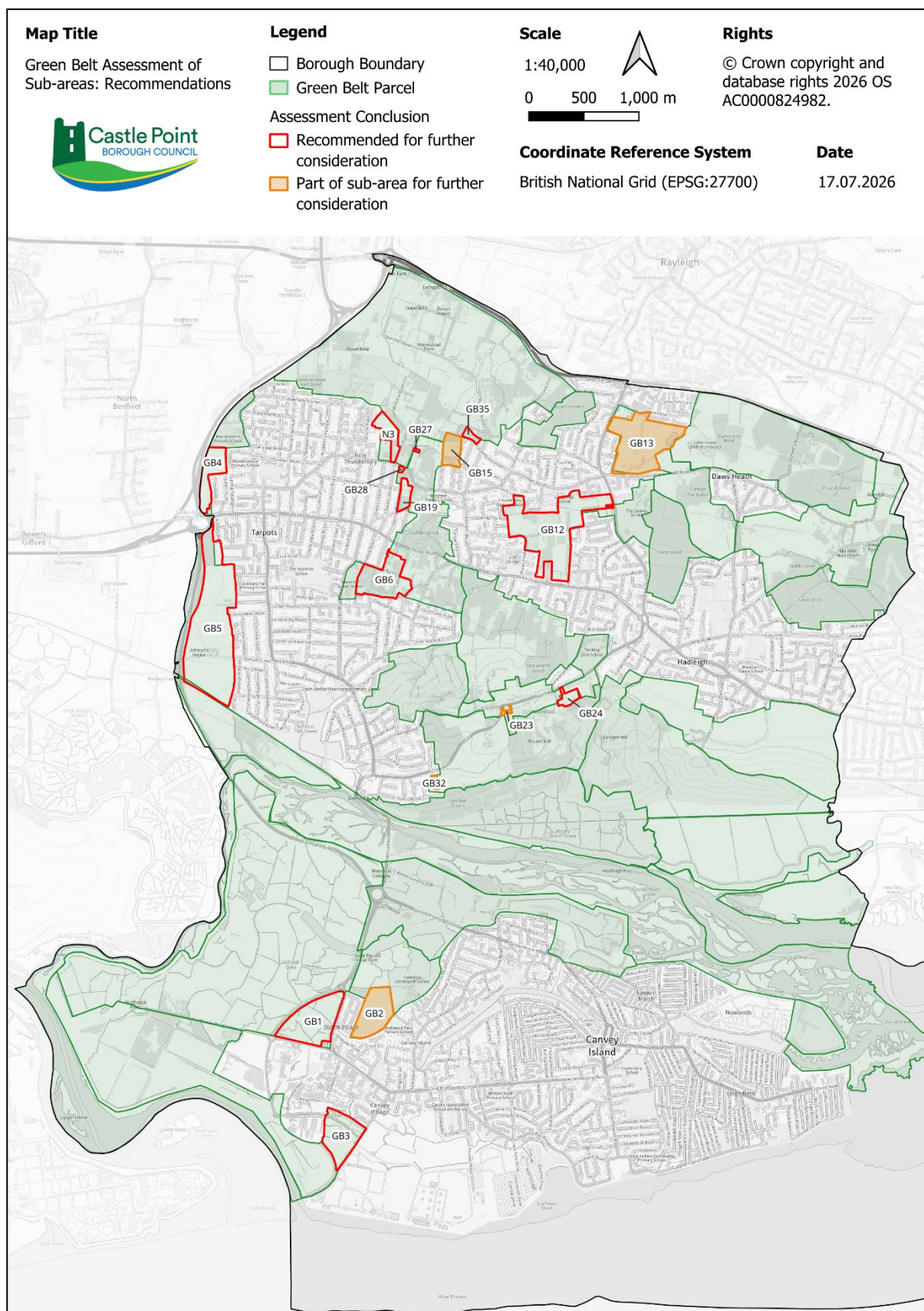
Introduction

- 2.1 The response to Part 1 sets out the strategic approach the Council has taken to determining that 6,196 homes is the appropriate level of growth for Castle Point, based on the environmental and infrastructure constraints that exist within the Borough.
- 2.2 It is recognised that this question is understandably seeking to test whether these overall constraints on supply can be justified on a site by site basis, addressing the requirements of paragraph 11 of the NPPF as it relates to the individual Green Belt sites promoted for inclusion in the Castle Point Plan. Based on its detailed analysis, the Council's position is that there is clear evidence that the allocation of any of these sites either individually or in combination would cause adverse environmental and/or infrastructure impacts that outweighs the benefits of any additional housing secured, when the Framework is taken as a whole.
- 2.3 The full suite of constraints limiting overall growth in Castle Point is set out in the response to Part 1 of this question which is based on the Housing Capacity Topic Paper August 2025 [\[7.09\]](#). This response focuses on drawing out the specific constraints applicable in relation to specific sites (see below) utilising the suite of evidence that supports the Castle Point Plan. These sites were recommended for further consideration by DAC Planning who prepared the Green Belt Assessment July 2025 [\[7.02\]](#).
- 2.4 This recommendation was based on DAC Planning's assessment of the Green Belt purposes only and did not represent a conclusion that these sites were suitable for allocation. It also did not include full assessment of wider planning considerations, including environmental infrastructure, accessibility, viability, heritage, flood risk, biodiversity and delivery constraints, as required by the PPG. Paragraph: 001 [Reference ID: 64-001-20250225](#) of the Green Belt Planning Practice Guidance states that '*Where grey belt is identified, it does not automatically follow that it should be allocated for development, released from the Green Belt or for development proposals to be approved in all circumstances. The contribution Green Belt land makes to Green Belt purposes is one consideration in making decisions about Green Belt land. Such decisions should also be informed by an overall application of the relevant policies in the National Planning Policy Framework (NPPF).*'
- 2.5 The Green Belt Assessment recommends 12 whole sub-areas for further consideration, alongside parts of a further five sub areas. Of these, 10 are considered strategic Green Belt sites and seven are non-strategic Green Belt sites¹. The response to this question focuses on those sites only (table 4 and map 6).

¹ Strategic sites are those with the potential to deliver 100 or more homes while non-strategic sites will deliver less than 100 homes

Strategic Sites	Non-Strategic Sites
GB1 – West of Canvey Road, Canvey Island	GB19 – Land North of Thundersley Church Road and East of Downer Road North, Thundersley
GB 2 - East of Canvey Road (further sub area), Canvey Island	GB23 - Land to the rear of 329 Benfleet Road (further sub area), Benfleet
GB3 - Land south of Charfleets, Canvey Island	GB24 - Land off Shipwrights Close, Benfleet
GB4 – Land off Glebelands, Benfleet	GB26 - Land between Glen Haven and Ye Oaks, Bassenthwaite Road, Benfleet
GB5 – West of Benfleet (Jotmans Farm), Benfleet	GB27 - Land Adjacent 298 Church Road, Benfleet
GB6 – Land between Felstead Road and Catherine Road, Benfleet	GB31 - Land off Glyders (further sub area), Benfleet
GB12 – The Chase, Thundersley	GB34 - Grandview Stables, Grandview Road, Thundersley
GB13 – East of Rayleigh Road (further sub area), Thundersley	
GB15 – North of Grasmere Road (further sub area), Thundersley	
N3 – East of Manor Trading Estate, Benfleet	

Table 4: Sites Recommended for Further Consideration by Green Belt Assessment



Map 6: Sites Recommended to the Council for Further Consideration [Green Belt Assessment [7.02](#), page 58, Figure 15].

Section 1 – Strategic Scale Sites

- 2.6 The Green Belt Assessment identified 10 strategic sites were recommended for further consideration. Based on an assumed density of 40 dwellings per hectare (dph), which represented a conservative estimate prior to the Density and Capacity Study July 2025 [\[11.01\]](#), these strategic sites had the potential to deliver approximately 3,410 additional homes and 34,594sqm of employment land during the plan period.
- 2.7 In this context however, the Council notes that analysis of recently submitted planning applications on Green Belt sites across the Borough indicates that landowners and developers are generally promoting an average density of 16dph across the gross site area. Applying this density assumption would result in the delivery of approximately 2,157 additional homes and 34,594sqm of employment land during the plan period.
- 2.8 For each of these strategic sites, the Council has considered the relevant evidence base, alongside information submitted through consultation responses and planning applications where appropriate to determine whether each site represents a suitable location for allocation in the Castle Point Plan.
- 2.9 The evidence base which has been considered includes:
- **Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)** – providing a high-level assessment of each site against 20 objectives across the environmental, social and economic considerations.
 - **Habitats Regulations Assessment (HRA)** – identifying whether development of each site has the potential for Likely Significant Effects on European designated habitat sites, including Ramsar sites, Special Protection Areas (SPA) and Special Areas of Conservation (SAC).
 - **Strategic Land Availability Assessment (SLAA)** – assessing the suitability, availability and achievability of sites identified as having the potential for development.
 - **Essex Local Nature Recovery Strategy** – identifying locations where habitat creation or enhancement would provide the greatest benefits for nature and the wider environment.
 - **Local Wildlife Site Review** – assessing sites across the Borough that require protection due to their biodiversity and importance as locally significant habitats.
 - **Heritage Impact Assessments** – assessing the potential heritage impacts arising from development of specific sites, including GB1, GB2 and GB8.
 - **Landscape Sensitivity and Outline Appraisal** – considering whether development of strategic Green Belt sites could impact the landscape character, openness and important landscape features.
 - **Strategic Flood Risk Assessment (SFRA)** – considering flood risk from all sources across the Borough.
 - **Green Belt Site Access Assessment** – assessing whether Green Belt Sites could be accessed safely, sustainably and suitably.
 - **Viability Assessment** – providing a high level economic assessment of whether sites and policies within the Castle Point Plan are economically deliverable.
- 2.10 The conclusions reached for each strategic site are summarised in the table below:

Site	Main site specific justification(s) for non-allocation
GB1 – West of Canvey Road, Canvey Island	The site comprises coastal grazing marsh, which is a highly distinctive habitat as defined by Government. The site is identified as a Local Wildlife Site and is consequently identified as an Area of Particular Importance for Biodiversity in the Local Nature Recovery Strategy. Addressing the impact of development through Biodiversity Net Gain would be challenging and is likely to prove prohibitive, either entirely, or at the expense of meeting the golden rule requirement for affordable housing. The HRA has identified that the site may be functionally linked to the Benfleet and Southend Marshes SPA and Ramsar and the Thames Estuary and Marshes SPA and Ramsar. Bird surveys would be required at the planning application stage to establish whether the site supports qualifying species associated with these designated habitats sites. If a functional linkage is confirmed, this would trigger a need for appropriate compensation measures. On the basis of the biodiversity impacts alone, the site is not considered appropriate for development. Furthermore, the potential heritage impact on the adjacent listed Dutch Cottage and flood risk constraints provide additional reasons why development would not be appropriate. This site is not considered appropriate for allocation within the Castle Point Plan.
GB 2 - East of Canvey Road (further sub area), Canvey Island	The HRA has identified that the site may be functionally linked to the Benfleet and Southend Marshes SPA and Ramsar site and the Thames Estuary and Marshes SPA and Ramsar site. Bird surveys would be required at the planning application stage to establish whether the site supports qualifying species associated with these designated habitats sites. If a functional linkage is confirmed, this would trigger a need for appropriate compensation measures. The site has operated under license as public open space for over 20 years. Development would therefore result in a loss of open space in a more densely populated part of the Borough, contrary to the objectives of the NPPF. The site is also bounded to the north by a Scheduled Monument. Access arrangements have remained unresolved since 2021 and continue to involve the loss of part of the Scheduled Monument, to, which Historic England maintain a strong objection.² These matters combined with flood risk constraints, mean that this site is not considered appropriate for allocation within the Castle Point Plan.
GB3 - Land south of Charfleets, Canvey Island	The close proximity of the site to the Oikos liquid and gas fuels port and storage facility, and the Calor Gas storage facility, both of which are COMAH sites means that it is not considered suitable for housing development. The site falls within the consultation zones for the Oikos facility. The site comprises coastal grazing marsh, which is highly distinctive habitat as defined by Government. The site is identified as a Local

²

See additional Statement of Common Ground between the Council and Historic England July 2026

Site	Main site specific justification(s) for non-allocation
	Wildlife Site and is consequently identified as an Area of Particular Importance for Biodiversity within the Local Nature Recovery Strategy. Addressing the impact of development through Biodiversity Net Gain would be challenging and is likely to prove prohibitive, either entirely, or at the expense of meeting the golden rule requirement for affordable housing. The HRA has identified that the site may be functionally linked to the Benfleet and Southend Marshes SPA and Ramsar site and the Thames Estuary and Marshes SPA and Ramsar site. Bird surveys would be required at the planning application stage to establish whether the site supports qualifying species associated with these designated habitats sites. If a functional linkage is confirmed, this would trigger a need for compensation measures. On the basis of these constraints, including the proximity of the site to the COMAH sites which is prohibitive to housing development, this site is not considered appropriate for allocation within the Castle Point Plan.
GB4 – Land off Glebelands, Benfleet	This is not considered to be a suitable location for housing development as it fails to demonstrate that it can provide a sustainable form of development in accordance with paragraphs 110 and 115 of the NPPF. In particular, the site does not benefit from good levels of accessibility by sustainable modes of transport and there remain concerns regarding the ability to provide safe and suitable access for all users. The location of the site, together with the density of development promoted, would not support the creation of a sustainable travel pattern. The scale and form of development would be likely to increase reliance on the private car, which would undermine the long term sustainability of the site as a development location. Furthermore, the close proximity of the site to the existing strategic road network means that this site provides poor amenity for future residents as a consequence of noise and air quality. This site is not considered appropriate for allocation within the Castle Point Plan.
GB5 – West of Benfleet (Jotmans Farm), Benfleet	This is not considered to be a suitable location for housing development as it fails to demonstrate that it can provide a sustainable form of development in accordance with paragraph 110 and 115 of the NPPF. In particular, the site does not benefit from good levels of accessibility by sustainable modes of transport and there remains concerns regarding the ability to provide safe and suitable access for all users. The proposals (planning application reference 26/0310/OUT) that have been brought forward for this site include access directly onto the strategic highway network. This approach is contrary to the Essex County Council Highway Policy DM2 and would exacerbate congestion on a route that already experiences capacity challenges at peak hours. The impact of additional traffic generation from development at this location raises concerns regarding the operation and safety of the surrounding highway network. Furthermore, the density of development promoted for the site would work against the long-term sustainability of sustainable travel options. The location of the site, together with its relationship to existing services,

Site	Main site specific justification(s) for non-allocation
	facilities and transport connections, would result in a development that is likely to have a high level of reliance on private cars, undermining its suitability as sustainable development location. In addition, the HRA has identified that the site may be functionally linked to the Benfleet and Southend Marshes SPA and Ramsar site and the Thames Estuary and Marshes SPA and Ramsar site. Bird surveys would be required at the planning application stage to establish whether the site supports qualifying species associated with these designated habitats sites. If a functional linkage is confirmed, this would trigger a requirement for appropriate compensation measures. On the basis of the highway impacts, accessibility concerns and potential ecological impacts, this site is not considered appropriate for allocation within the Castle Point Plan.
GB6 – Land between Felstead Road and Catherine Road, Benfleet	This site is not considered to be a suitable location for housing development due to the significant biodiversity constraints with the site and the inability to demonstrate that the impacts of development could be appropriately mitigated. Approximately 48% of this site is covered by woodland. The site comprises Kents Hill Wood, which is identified as a Local Wildlife Site, and contains areas identified within the within the Local Nature Recovery Strategy as Areas of Particular Importance for Biodiversity, including areas of scrub, grassland and standing water. The ecological value of the site means that the development would result in significant biodiversity impacts. Addressing these impacts through Biodiversity Net Gain would likely prove prohibitive, as the costs associated with mitigation have not been factored into the viability assessment. As BNG is a legal requirement, the additional costs associated with achieving the required mitigation, would likely to impact upon the ability of the site to meet other policy requirements, including the delivery of affordable housing in accordance with the Government's golden rule. Furthermore, the absence of a comprehensive development scheme for the wider site would result in fragmented and piecemeal development. This would prevent the effective consideration of landscape, biodiversity and infrastructure requirements in a coordinated manner and would fail to make effective use of the land. On the basis of the biodiversity value of the site and the significant mitigation requirements arising, this site is not considered appropriate for allocation within the Castle Point Plan.
GB12 – The Chase, Thundersley	The site is not considered to be a suitable location for housing development due to significant biodiversity, landscape and delivery constraints associated with the site. The site includes The Chase Paddocks Local Wildlife Site and is consequently identified within the Local Nature Recovery Strategy as an Area of Particular Importance for Biodiversity. The remainder of the site is also identified as a Strategic Opportunity Area (within the top 25%) for the creation of woodland and grassland habitats through the Local Nature Recovery Strategy.

Site	Main site specific justification(s) for non-allocation
	The ecological value of the site means that development would result in significant biodiversity impacts. Addressing these impacts through Biodiversity Net Gain would likely prove prohibitive, as the associated costs have not been factored into the viability assessment. As BNG is a legal requirement, the additional costs associated with achieving the required mitigation, would likely impact upon the ability of the site to meet other policy requirements, including the delivery of affordable housing in accordance with the Government's golden rule. The site is also subject to significant delivery challenges, with 18 separate landowners across the wider site. Developers have promoted separate parcels independently of one another, rather than bringing forward a comprehensive development proposal. This approach means that proposals submitted to date have failed to address the wider landscape, biodiversity and infrastructure requirements in a coordinated and effective manner, and have not demonstrated that the site can deliver a sustainable form of development. Furthermore, the density of development promoted within the development areas of the site would not overcome these concerns, with densities typically around 36 dwellings per hectare for the development area (equating to between approximately 24 and 30 dwellings per hectare across the gross site area). This fragmented approach would not make effective use of land or provide the comprehensive mitigation required for the site. On the basis of the biodiversity value of the site, the landscape sensitivities and the significant delivery constraints, the site is not considered appropriate for allocation within the Castle Point Plan.
GB13 – East of Rayleigh Road (further sub area), Thundersley	This site is not considered to be a suitable location for housing development due to a combination of highway and landscape impacts. The proposal has not demonstrated how safe and suitable access onto the A129 can be achieved, nor how the residual impacts of additional traffic generation on the surrounding highway network, including along the A129 and at the Rayleigh Weir junction, can be satisfactorily addressed. Existing congestion on the A129 presents concerns regarding the safety of pedestrians and cyclists. Furthermore, an appeal relating to this site (planning application reference 23/0085/OUT) was dismissed in 2024. The Inspector in that appeal concluded that the proposal represented inappropriate development in the Green Belt for which very special circumstances did not exist. The development was found to result in substantial spatial harm and significant visual harm through loss of openness, encroachment into the countryside and contribution to coalescence of settlements harm was also identified in relation to the character and appearance of the surrounding area and countryside. Whilst the Green Belt Assessment July 2025 identified the site as a sub-area for further consideration from a Green Belt perspective, this assessment did not represent a full assessment of the site's suitability for allocation. The additional evidence relating to highway impacts and landscape harm demonstrates that the site is not an appropriate location for housing development.

Site	Main site specific justification(s) for non-allocation
	On the basis of the unresolved transport impacts and significant landscape harm, this site is not considered appropriate for allocation within Castle Point Plan.
GB15 – North of Grasmere Road (further sub area), Thundersley	This site it not considered to be a suitable location for housing development due to a combination of sustainability constraints. The site performs poorly in sustainability terms, with its location limiting opportunities to promote sustainable patterns of development. These constraints reduce the site's suitability for allocation and give rise to concerns regarding its ability to support development consistent with the objectives of the NPPF. Accordingly, this site is not considered appropriate for allocation within the Castle Point Plan.
N3 – East of Manor Trading Estate, Benfleet	The site is not considered to be a suitable location for housing development due to significant biodiversity, arboriculture and amenity constraints. The site is identified as a Strategic Opportunity Area (within the top 25%) for the creation of grassland, fresh water standing and woodland habitats through the Local Nature Recovery Strategy. In addition, the site is subject to a blanket Tree Preservation Order and a subsequent restocking notice, reflecting the importance of the existing woodland and tree cover. Development of the site would therefore result in significant impacts on biodiversity and protected trees. Addressing these impacts through Biodiversity Net Gain and other mitigation measures would likely prove prohibitive, particularly as these costs have not been factored into the viability assessment. As BNG is a legal requirement, the additional costs associated with achieving the required mitigation, would likely impact upon the ability of the site to meet other policy requirements, including affordable housing in accordance with the Governments golden rule. The site is also subject to significant amenity constraints arising from the adjacent waste processing facility. A previous application for residential development (planning reference 21/0532/OUT) was dismissed on appeal due to unacceptable noise impacts on future occupiers. Although substantial mitigation measures were proposed, the Inspector concluded that these would not provide an acceptable standard of residential amenity. The waste processing facility remains operational, and the circumstances have not materially changed. Furthermore, the Council has entered into a SOCG with Essex County Council 2025 in its role as the Waste Planning Authority [12.02], which confirms that the that the principal of residential development on this site is not supported due to the proximity to Benfleet Scrap. On the basis of the site's biodiversity value, protected trees and the unacceptable noise environment arising from the adjoining waste processing facility, this site is not considered appropriate for allocation within the Castle Point Plan.

Table 5: Strategic Sites recommended for further consideration justification for non-allocation

- 2.11 On the basis of this analysis the Council considers that there are clear planning reasons that direct the exclusion of each site from inclusion in the Castle Point Plan, beyond matters of Green Belt.

Section 2 – Non-strategic Scale Sites

- 2.12 Following the Planning Inspectorate Advisory Visit on the 27 February 2025 [[13.02](#), page 4], during which the Council was advised to review Green Belt sites capable of delivering fewer than 100 homes that had previously been discounted, further work was undertaken to assess non-strategic Green Belt sites.
- 2.13 As a result the following evidence base documents were produced and/or updated;
- Density and Capacity Study July 2025 [[11.01](#)]
 - Castle Point Green and Blue Infrastructure Strategy Update July 2025 1 of 2 [[6.08](#)]
 - Castle Point Green and Blue Infrastructure Strategy Update July 2025 2 of 2 [[6.09](#)]
 - Castle Point Green Belt Assessment July 2025 [[7.02](#)]
 - Green Belt Site Access Assessment July 2025 [[7.07](#)]
 - Infrastructure Delivery Plan May 2025 (IDP) [[9.02](#)]
- 2.14 The Green Belt Assessment identified 7 non-strategic sites that should be considered further by the Council. Based on an assumed density of 40 dwellings per hectare, these sites have the potential to only deliver an additional 248 homes during the plan period.
- 2.15 As set out in answer to Question 1 above, there are various strategic constraints which necessarily limit the overall scale of growth in the Castle Point Plan to 6,196 homes. Those constraints apply equally to the non-strategic Green Belt sites identified for further consideration.
- 2.16 Whilst the non-strategic sites were not individually subject to HRA Screening, all sites have the potential to give rise to Likely Significant Effects through recreational disturbance, as the whole Borough falls within the Essex Coast RAMS Zone of Influence. In addition, Site GB31 - Land off Glyders (further sub area), Benfleet, lies immediately adjacent to the Benfleet and Southend Marshes SPA and Ramsar site, giving rise to the potential for more significant ecological effects, including potentially direct effects.
- 2.17 GB31 is subject to additional site-specific constraints. The site has a significant change in topography, with ground levels ranging from approximately 45m Above Ordnance Datum (AOD) along the southern site boundary to approximately 30m AOD at the northern site boundary. This creates challenges in terms of overlooking, loss of privacy for neighbouring properties, construction and long term site stability. In addition, a gas main runs along the eastern boundary limiting access from the east either in terms of a permanent access to the site, and/or access during the construction phase.
- 2.18 All non-strategic sites have been assessed through the SA/SEA, SLAA, Green Belt Site Access Assessment and SFRA. Collectively, these assessments identify varying degrees of flood risk, biodiversity and sustainable access constraints.
- 2.19 The following sites have been identified in the LNRS as Strategic Opportunity Areas:
- GB26 – Land between Glen Haven and Ye Oaks, Bassenthwaite Road, Benfleet
 - GB27 – Land Adjacent 298 Church Road, Benfleet
 - GB31 – Land off Glyders (further sub area), Benfleet
 - GB34 – Grandview Stables, Grandview Road, Thundersley
- 2.20 Site GB24 - Land off Shipwrights Close, Benfleet, is also identified within the LNRS as an Area of Particular Importance for Biodiversity.
- 2.21 The Council has concluded that these non-strategic sites are not considered appropriate for allocation in the Castle Point Plan, due to their biodiversity value in accordance with NPPF paragraph 192.

- 2.22 Having regard to these constraints, together with the strategic considerations set out elsewhere in this response, the Council considers that there are clear planning reasons, beyond Green Belt considerations alone, which necessitate the exclusion of each of the non-strategic sites from allocation within the Castle Point Plan.

Section 3 - Omission Sites with Planning Permission

- 2.23 The question specifically asks about sites with planning permission, and queries whether the existence of permission on those certain Green Belt sites identified by DAC Planning for further consideration, justifies their allocation.
- 2.24 There are four sites within the current extent of the Green Belt which benefit from planning permission.

Application No.	Site Name	Gross Site Area	Development Area	No. of Homes
21/137/FUL	Land rear of 248 Hart Road, Thundersley	1.70 ha	1.4 ha	44
22/0484/FUL	Land at Brook Farm, Daws Heath Road, Thundersley	18.93 ha	6.2 ha	173
23/0241/OUT	Land East of Chase Mews, The Chase, Thundersley	1.56ha	1.29 ha	47
24/0579/OUT	Land rear of 301 Rayleigh Road, Thundersley	0.44 ha	0.24 ha	9

Table 6: Sites granted planning permission in the Green Belt within sites there recommended for further consideration by the Green Belt Assessment

- 2.25 Land at Brook Farm forms part of site GB10. However, GB10 was **not** recommended for further consideration as part of the Green Belt Assessment July 2025. The Green Belt Assessment concluded that this site performed strongly against Green Belt purposes A and C and moderately in respect of purpose B. Whilst DAC Planning considered the appeal decision relating to the planning permission when preparing the Green Belt Assessment, it nevertheless concluded that the site should not be recommended for further consideration, recognising the cumulative implications for Green Belt purposes A and C across the wider area.
- 2.26 Notwithstanding this conclusion, planning permission has been granted for 173 dwellings and the site is included within the Council's Housing Position Update Note – July 2026 as part of the identified housing supply.
- 2.27 Land East of Chase Mews, Land rear of 301 Rayleigh Road and Land rear of 248 Hart Road all fall within Site GB12. The supply from Land East of Chase Mews and Land rear of 301 Rayleigh Road is included within the Housing Position Update Note – July 2026. Development on Land rear of 248 Hart Road has completed.
- 2.28 The Council recognises that the grant of planning permission on these individual parcels has Green Belt implications. In particular, the cumulative effect of the permissions is to sever the Green Belt to the west of the site from the wider Green Belt to the east, creating an isolated area of Green Belt.
- 2.29 However, the existence of planning permissions on parts of GB12 does not, in itself, justify the allocation of the remainder of the site. As set out in Table 5, the wider site is subject to significant constraints relating to biodiversity, landscape and delivery, which are separate from Green Belt considerations. These constraints provide clear planning reasons why the remainder of the site is not suitable for allocation.
- 2.30 This approach is consistent with the plan-making framework in the NPPF. Whilst Green Belt considerations formed part of the assessment, the Council has also had regard to the wider environmental, ecological and landscape evidence. In particular, the approach reflects the requirements of paragraphs 188 and 192 of the NPPF in relation to conserving and enhancing the natural environment.

- 2.31 Accordingly, notwithstanding the grant of planning permission for Land East of Chase Mews, Land rear of 301 Rayleigh Road and Land rear of 248 Hart Road, the Council does not consider that it follows that the remainder of Site GB12 should be allocated for housing development.

Section 4 – Conclusion

- 2.32 The Council considers that the evidence base provides clear and robust justification for not allocating the sites identified by the DAC Planning Green Belt Assessment July 2025 [7.02, page 58, figure 15] for development.
- 2.33 The DAC Planning assessment was undertaken for the specific purpose of identifying whether Green Belt sites may warrant further consideration from a Green Belt perspective. It did not conclude that those sites should be allocated for development, nor did it assess the full range of planning considerations required through the plan-making process, including biodiversity, habitats, flood risk, landscape, heritage, accessibility, infrastructure, viability, deliverability other environmental constraints.
- 2.34 The Council has subsequently undertaken a comprehensive assessment of all strategic and non-strategic Green Belt sites through the preparation of the evidence base supporting the Castle Point Plan. That assessment demonstrates that every site recommended for further consideration is affected by one or more significant constraints which, either individually or cumulatively, direct its exclusion from allocation.
- 2.35 In many cases, those constraints relate to matters to which national policy directs that significant weight should be given, including impacts on internationally, nationally and locally important biodiversity assets, Local Wildlife Sites, Areas of Particular Importance for Biodiversity, irreplaceable habitats, flood risk, heritage assets, landscape sensitivity and sustainable accessibility. Other sites are constrained by transport impacts, infrastructure capacity, viability, fragmented land ownership, deliverability, or an inability to achieve policy-compliant development, including affordable housing and biodiversity net gain.
- 2.36 The Council therefore concludes that there is clear and compelling evidence demonstrating that the sites identified by the DAC Green Belt Assessment July 2025 [7.02, page 56 table 11 and page 58, figure 15] for further consideration, are not appropriate allocations for development. Their exclusion is necessitated by site-specific and strategic planning constraints, and is consistent with the Framework when read as a whole.

3 Q1, part b) Is there clear evidence that altering Green Belt boundaries to meet all or more of the area's objectively assessed housing need would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the Plan?

Introduction

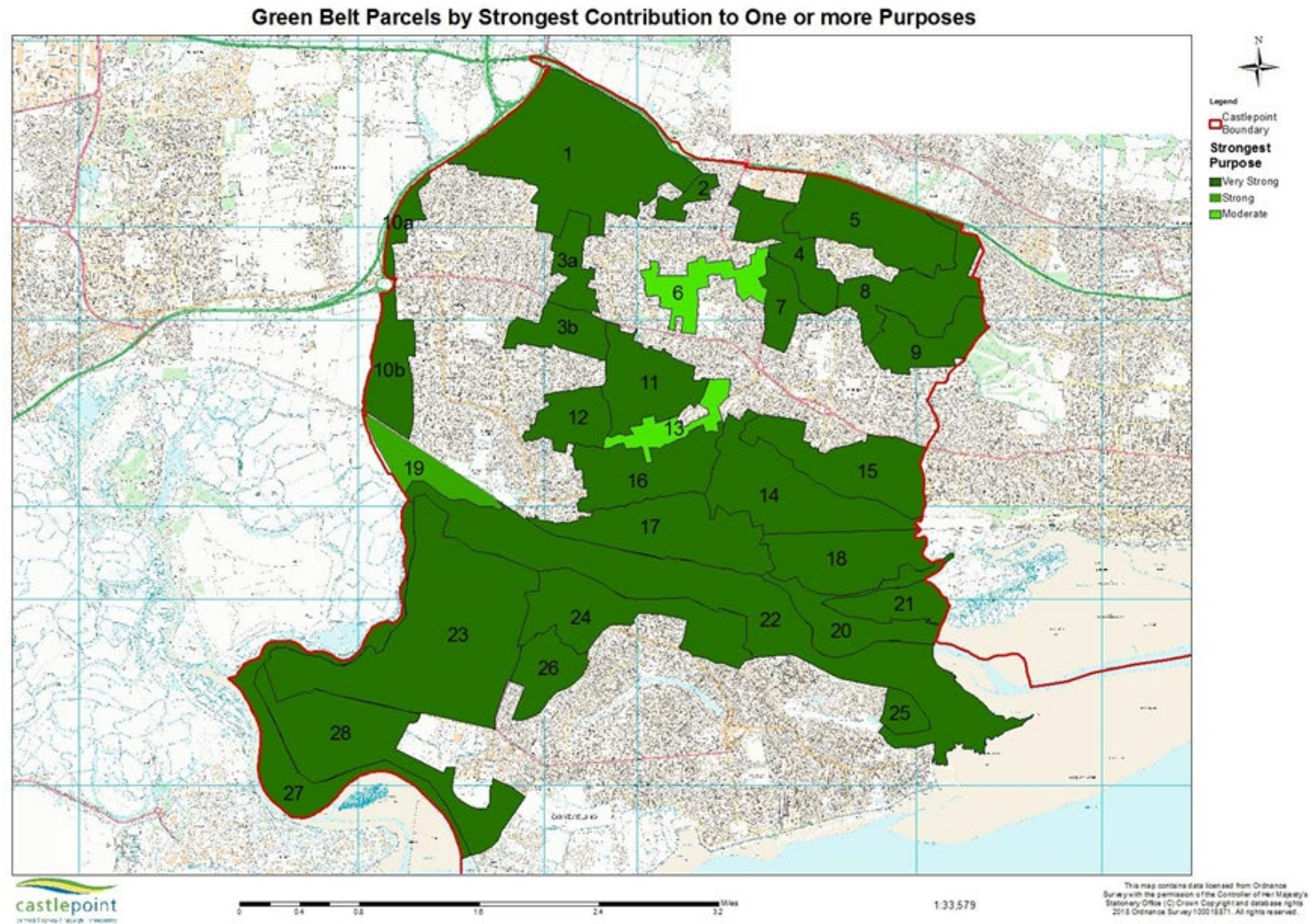
- 3.1 This question addresses the test set out in paragraph 146 of the National Planning Policy Framework (NPPF). The Council's position is that there is clear and robust evidence demonstrating that altering Green Belt boundaries to meet all, or a greater proportion, of the area's objectively assessed housing need, as identified by the Standard Method, would fundamentally undermine the purposes of the remaining Green Belt, when those purposes are considered together across the Plan area.
- 3.2 That conclusion is based on the cumulative findings of the Council's Green Belt evidence, together with the wider evidence base prepared to support the Castle Point Plan. It reflects not only the performance of individual Green Belt sites, but also the strategic role that the Green Belt performs in maintaining the spatial integrity of the Borough and its relationship with the wider South Essex Green Belt.
- 3.3 The principal evidence relevant to reaching this conclusion arises from the following four documents:
- Green Belt Review Part One 2018 [\[7.01\]](#)
 - Castle Point Green Belt Assessment July 2025 [\[7.02\]](#) and [\[7.03\]](#)
 - Whole Plan Viability Study Report July 2025 [\[9.39\]](#)
- 3.4 Taken together, these documents demonstrate that the Green Belt in Castle Point performs an important strategic role in meeting four of the five purposes of the Green Belt identified in paragraph 143 of the NPPF, namely:
- (a) **To check the unrestricted sprawl of large built-up areas;**
 - (b) **To prevent neighbouring towns merging into one another;**
 - (c) **To assist in safeguarding the countryside from encroachment;...**
 - (e) **To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.**
- 3.5 The Council's position is that Green Belt purpose D, relating to preserving the setting and special character of historic towns, does not apply strategically within Castle Point. The reasons for that conclusion are set out in section 2.6 of the Green Belt Assessment July 2025 [\[7.02\]](#), page 13]. Nevertheless, the Council recognises, together with Historic England, that parts of the Borough's Green Belt make an important contribution to the setting of designated heritage assets, including Scheduled Monuments. Those site-specific heritage considerations are reflected elsewhere in the evidence base, including the Statement of Common Ground with Historic England dated July 2026.
- 3.6 The sections below explain why the evidence demonstrates that further Green Belt release, beyond that proposed in the Castle Point Plan, would fundamentally undermine the purposes of the remaining Green Belt when considered across the Plan area, consistent with paragraph 146 of the NPPF.

Section 1 - Green Belt Purposes A, B and C – the spatial purposes

- 3.7 To answer this question, the Council must demonstrate how the Green Belt performs against purposes A, B and C of paragraph 143 of the NPPF, and why altering Green Belt boundaries to accommodate all, or a greater proportion, of the Borough's objectively assessed housing need would fundamentally undermine those purposes when considered across the Plan area, as required by paragraph 146 of the NPPF.
- 3.8 Purposes A, B and C are spatial in nature and therefore require consideration not only of the contribution made by individual sites, but also of how the Green Belt functions strategically across the Borough as a whole.

- 3.9 The Council's assessment is informed by two complementary pieces of evidence. The first is the Green Belt Review Part One 2018 [\[7.01\]](#), which assessed the performance of the Green Belt at the parcel level. The second is the Castle Point Green Belt Assessment July 2025 [\[7.02\]](#) and [\[7.03\]](#), which updated the assessment to reflect the December 2024 NPPF and the Green Belt Planning Practice Guidance published in February 2025, and considered smaller sub-areas promoted through the Call for Sites process.
- 3.10 The Green Belt Review Part One 2018 [\[7.01\]](#) divided the Green Belt into 30 parcels, and assessed each parcel against Green Belt purposes A, B and C [\[7.01\]](#), page 35, figure 3]. It concluded that all but two parcels made a strong contribution to at least one of those purposes, demonstrating that the Green Belt performs an important strategic role across the Borough [\[7.01\]](#), pages 36–37, Table 6, and page 49, Figure 7]. For ease of reference, the relevant plan is reproduced below.

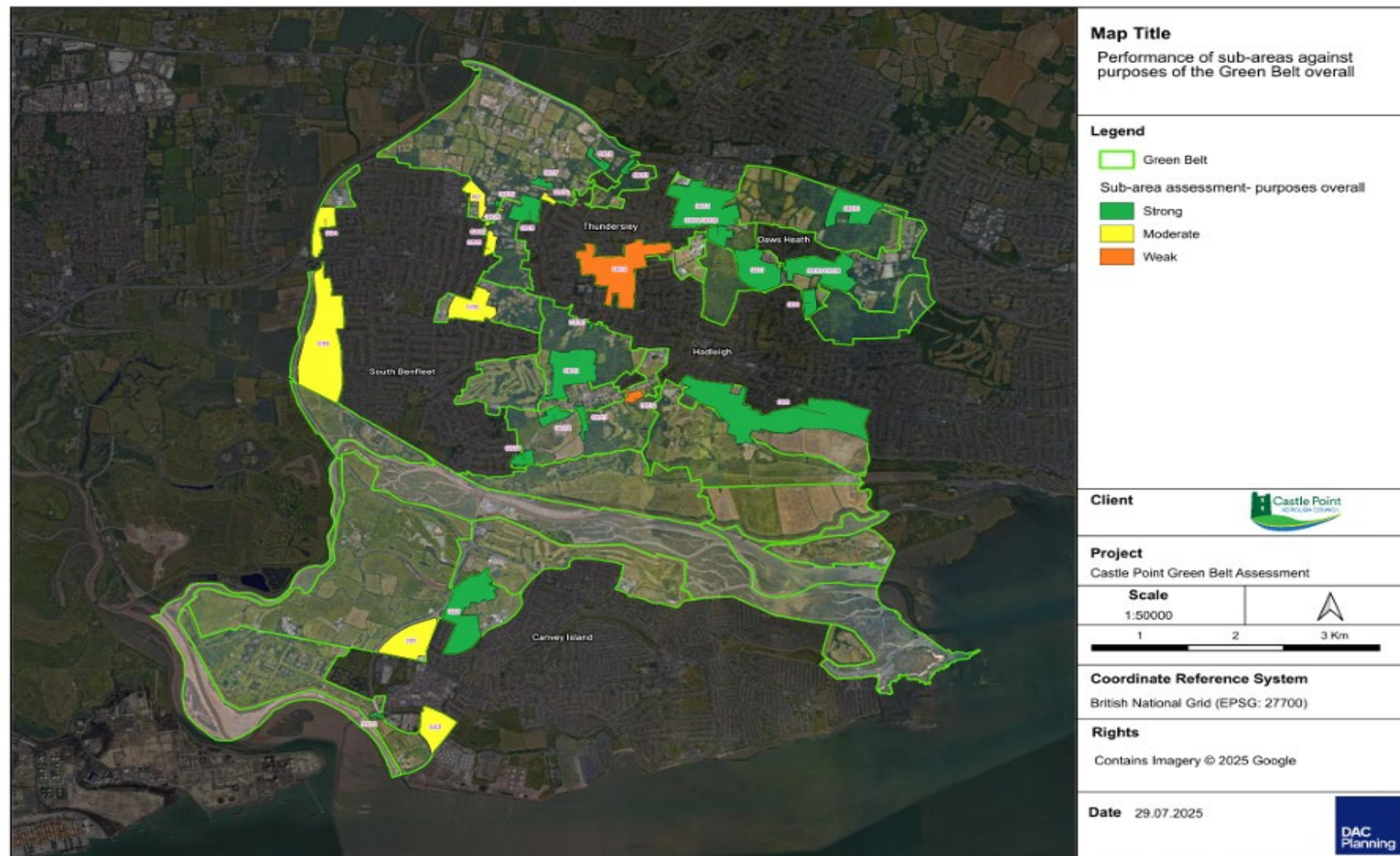
Figure 7: Green Belt Parcels by Strongest Contribution to One or More Green Belt Purposes



Map 7: Green Belt Parcels by strongest contribution to one or more purposes [Green Belt Review 2018, [7.01](#), page 49, figure 7].

- 3.11 The fundamental aim of the Green Belt is to prevent urban sprawl by keeping land permanently open. Although the Green Belt Review Part One was prepared in 2018, the purposes of including land within the Green Belt have remained unchanged and there has been no significant development which would alter the strategic role or function of the Green Belt parcels identified in that assessment.
- 3.12 The Council nevertheless reviewed whether the 2018 assessment remained fit for purpose. As part of preparing the Green Belt Assessment July 2025, DAC Planning used the Green Belt Review Part One as the starting point for its assessment. Paragraph 2.7.11 of the Green Belt Assessment July 2025 [7.02, page 19] records that the Inspector examining the previous Local Plan found the 2018 Review to be robust. DAC Planning also concluded that the Green Belt Review Part One remained a valid basis for assessment, whilst recognising that updates were required to reflect the revised national policy and guidance, together with any changes on the ground since 2018.
- 3.13 The Green Belt Assessment July 2025 therefore undertook a more detailed assessment of smaller sub-areas within a number of Green Belt parcels to consider the implications of potential Green Belt release. The methodology follows the Green Belt Planning Practice Guidance published in February 2025 and is set out in Section 4 of the Assessment [7.02, pages 31–37].
- 3.14 The Planning Practice Guidance does not prescribe a methodology for assessing Green Belt purpose C. The methodology adopted by DAC Planning therefore reflects professional planning judgement and current best practice in assessing the contribution of land to safeguarding the countryside from encroachment.
- 3.15 The sub-areas assessed comprised sites promoted to the Council through the Call for Sites process, representing those areas most likely to be available for development if identified for allocation within the Castle Point Plan. A total of 35 sub-areas were assessed on this basis [7.02, page 45, Figure 10].
- 3.16 Each sub-area was assessed against Green Belt purposes A, B and C. The detailed assessments are contained within Appendix C of the Green Belt Assessment July 2025 [7.03, pages 41–155], with the overall findings summarised in Section 5.3 and the cumulative conclusions set out in Section 5.4, Table 10 and Figure 14 [7.02, pages 44–54]. The relevant plan is reproduced below for ease of reference.

Figure 14: Performance of sub-areas against purposes of the Green Belt overall

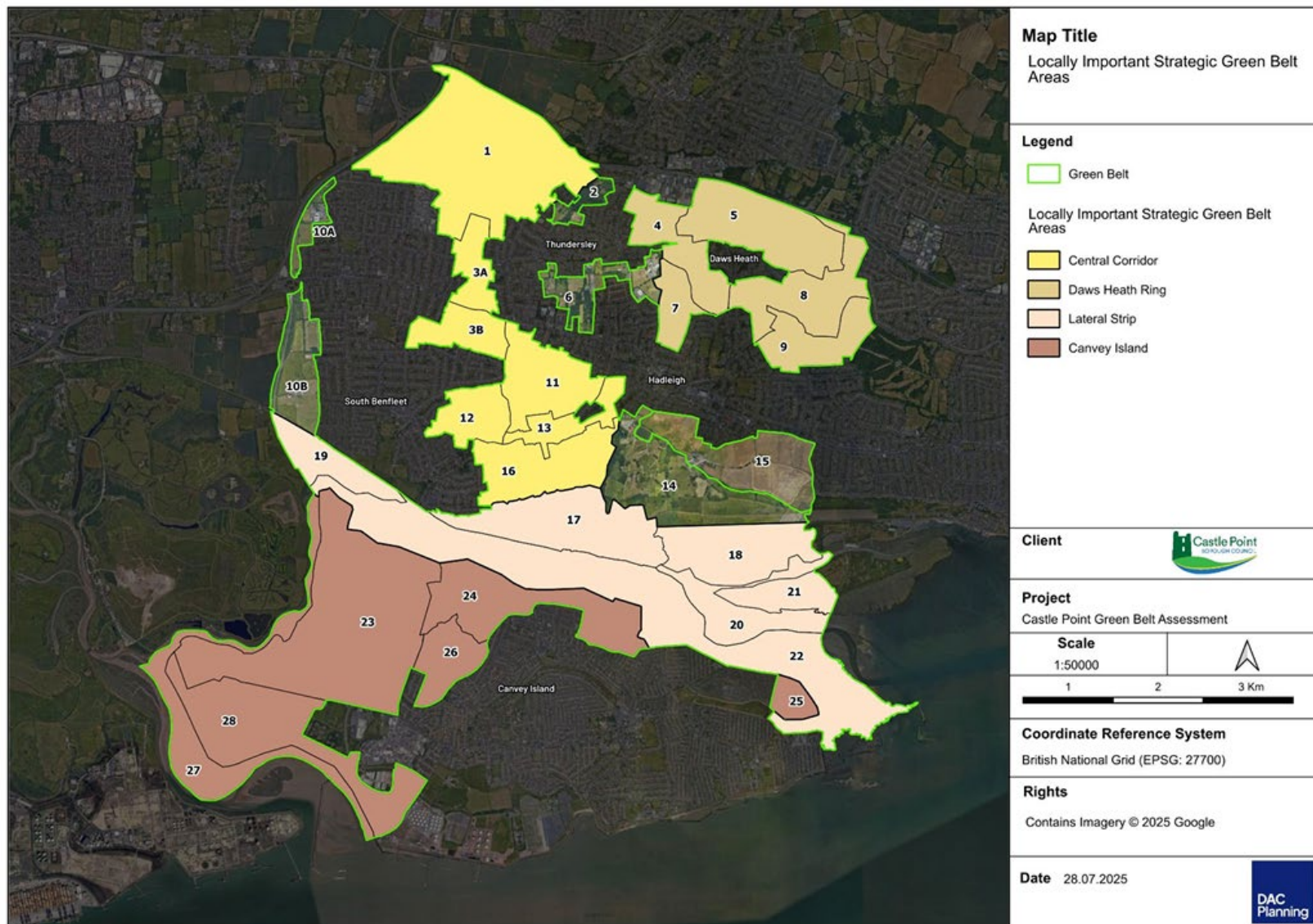


Map 8 : Performance of sub-areas against purposes of the Green Belt overall [Green Belt Assessment July 2025, 7.02, page 54, figure 14]

How has the Council assessed the impact of development on Green Belt sites on purposes A, B and C when taken as a whole?

- 3.17 The preceding paragraphs explain how the Council has assessed individual Green Belt sites against purposes A, B and C. The Council recognises that, if individual sites are considered in isolation, it would not conclude that the release of any single site would, by itself, *“fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the Plan”*, as required by paragraph 146 of the NPPF.
- 3.18 However, paragraph 146 requires consideration of the cumulative effect of Green Belt alterations across the Plan area. The assessment is therefore not confined to the impact of releasing individual sites, but extends to the collective effect of multiple Green Belt releases on the remaining Green Belt network and its ability to continue performing its strategic functions.
- 3.19 To facilitate this strategic assessment, the Green Belt Review Part One 2018 identified four Locally Important Strategic Green Belt Areas [7.01, page 56, figure 9, page 57, figure 10, page 58, figure 11, and page 59, figure 12]. These areas are also identified in the Green Belt Assessment July 2025 [7.02, page 18, figure 4], and are reproduced below for ease of reference.
- 3.20 Drawing together the parcel-level assessment contained within the Green Belt Review Part One 2018 and the more detailed sub-area assessment undertaken through the Green Belt Assessment July 2025 enables the Council to consider the cumulative implications of Green Belt release across the Borough. This demonstrates how the loss of multiple sites, even where individual sites make only a moderate contribution when viewed in isolation, would progressively weaken the strategic role and effectiveness of the remaining Green Belt when considered across the Plan area as a whole.

Figure 4: Locally Important Strategic Green Belt Areas in Castle Point



Map 9: Locally Important Strategic Green Belt Areas [Green Belt Assessment July 2025, 7.02, page 18, figure 4]

Locally Important Strategic Green Belt Areas

Central Corridor

- 3.21 The Green Belt Assessment identifies a number of sub-areas within the Central Corridor Locally Important Strategic Green Belt Area, including GB6, GB19, GB26, GB27 and N3. Whilst these sub-areas generally make a **moderate contribution** to Green Belt purposes when assessed individually [7.02, page 54, figure 14], collectively they perform a much more significant strategic role in maintaining the integrity of the Green Belt across the Borough.
- 3.22 In particular, the Central Corridor forms the principal area of separation between South Benfleet and Thundersley. It also contributes to the wider strategic function of maintaining separation between Castle Point's settlements and, in the north west, the neighbouring settlements of Rayleigh in Rochford and Wickford in Basildon. The cumulative contribution of these sites is therefore materially greater than the sum of their individual assessments.

Purpose	Impact across the area of the Plan
A – To check the unrestricted sprawl of large built-up areas	The central corridor forms a substantial open area adjoining the urban edge of Benfleet, Thundersley, Hadleigh and Daws Heath. It provides a clear distinction between built up areas and the wider countryside and helps contain outward expansion of development.
B – To prevent neighbouring towns merging into one another	One of the main functions of this corridor is to maintain the separation between Benfleet and Thundersley, and prevent them from merging with one another. Without the central corridor, the two settlements would be indistinct and the wider Green Belt would be fragmented. At the South Essex level, the central corridor also plays an important role in separating the Castle Point settlements from neighbouring settlements of Rayleigh in Rochford and Wickford in Basildon.
C – To assist in safeguarding the countryside from encroachment	The area contains extensive open land, agricultural fields, woodland and undeveloped areas which retain a predominately rural character. The central corridor helps to protect and maintain this.

Table 7: Central Corridor Locally Important Strategic Green Belt Area

- 3.23 The Council therefore concludes that releasing land within the Central Corridor to accommodate all, or a materially greater proportion of, the Borough's objectively assessed housing need would significantly reduce the effectiveness of this strategically important Green Belt area. When considered across the Plan area as a whole, such releases would weaken the separation between settlements, reduce openness and fundamentally undermine the purposes of the remaining Green Belt taken together.
- 3.24 The Council also notes that land at North West Thundersley makes a particularly significant contribution to the Green Belt by preventing the coalescence of Benfleet and Thundersley with Rayleigh and Wickford, and forms an important strategic gap within the South Essex context [Green Belt Review 2018, 7.01, page 67]. The Green Belt Review identified this area (Parcel 1) as making a **strong** contribution to purpose A and **very strong** contribution to purpose B on this basis.

Daws Heath Ring

- 3.25 The Green Belt Assessment concludes that those sub- areas within the Daws Heath Ring (GB9, GB10, GB11, GB13, GB14, GB20, GB28 and GB29) make a **strong overall contribution** to the purposes of the Green Belt [7.02, page 54, figure 14].

- 3.26 Consistent with this assessment, the Green Belt Assessment did not recommend any of these sub-areas for further consideration for development.

Purpose	Impact across the area of the Plan
A – To check the unrestricted sprawl of large built-up areas	The Daws Heath Ring forms a buffer around Daws Heath to contain development and maintain a clear distinction between the built-up area and the surrounding countryside. This prevents the outward expansion into the surrounding ancient woodland and open land, ensuring the semi-rural character of the area is maintained.
B – To prevent neighbouring towns merging into one another	The Daws Heath separates Daws Heath from Hadleigh and Thundersley. This ensures that Daws Heath maintains its distinct identity. It also maintains the separation between Hadleigh and Rayleigh in Rochford, at the South Essex strategic level.
C – To assist in safeguarding the countryside from encroachment	The area contains extensive woodland, areas of open space and undeveloped land that contribute significantly to the distinctive character of Daws Heath. The Green Belt helps protect these landscapes from urban encroachment, maintaining biodiversity, landscape character and the transition between urban and rural areas.

Table 8: Daws Heath Ring Locally Important Strategic Green Belt Area

- 3.27 The Council considers that the Daws Heath Ring performs an important strategic Green Belt function. By preventing settlement coalescence, it has enabled Daws Heath to retain a distinct semi-rural character that differs markedly from other settlements within Castle Point and the wider South Essex area, and acts to separate Hadleigh and Rayleigh.
- 3.28 Accordingly, the Council agrees with the findings of the Green Belt Assessment that development within the Daws Heath Ring would significantly weaken the strategic purposes of the Green Belt. The Council therefore concludes that the release of land within this area would contribute to fundamentally undermining the purposes of the remaining Green Belt when considered across the Plan area as a whole.

Lateral Strip

- 3.29 There are no sub- areas located in parcels 19, 17, 18, 20, 21 or 22. This is largely due to this area being predominately within Flood Zone 3, which is a physical constraint to development.
- 3.30 Notwithstanding this, the Lateral Strip represents an important strategic area of Green Belt within Castle Point. It provides separation between settlements of Hadleigh and Benfleet from Canvey Island and contributes to maintaining the distinct identity of these settlements.
- 3.31 The area is also adjacent to the South Benfleet Conservation Area and is located in proximity to a number of heritage assets, including Hadleigh Castle (a Grade I listed building), the Roman Fort and the heavy anti-aircraft gun site on Sandpit Hill, all of which are Scheduled Monuments. Whilst Green Belt Purpose D is not considered applicable at the strategic level, the Council recognises that the openness and undeveloped character of this area contributes to the setting of these heritage assets.

Purpose	Impact across the area of the Plan
A – To check the unrestricted sprawl of large built-up areas	The lateral strip provides a clear boundary between the built up areas of Canvey Island, Benfleet and Hadleigh and the surrounding countryside. Development is contained to the urban area and prevents the further outward expansion into areas of open land.

Purpose	Impact across the area of the Plan
B – To prevent neighbouring towns merging into one another	The lateral strip ensures the separation of Hadleigh and Benfleet from Canvey Island.
C – To assist in safeguarding the countryside from encroachment	The area contains open land, woodland, agricultural land and is generally undeveloped. This contributed to the semi-rural setting of area. The lateral strip helps to protect these landscapes from urban encroachment and maintains the transition between the urban and rural.
D - To preserve the setting and special character of historic towns	Although purpose D cannot be considered at the strategic level, the Lateral Strip does help maintain the rural setting of heritage assets and their setting within the Borough, notably the South Benfleet Conservation Area, Hadleigh Castle (Grade I listed) and multiple scheduled monuments (Roman Fort, Hadleigh Castle and Sandpit Hill).

Table 9: Lateral Strip Locally Important Strategic Green Belt Area

- 3.32 The Green Belt Assessment does not support development within the Lateral Strip. The Council considers that this reflects the important strategic role this area performs in maintaining separation between settlements, safeguarding open countryside and protecting the wider Green Belt network.
- 3.33 The release of land within this area would weaken the strategic function of the remaining Green Belt and would contribute to the cumulative erosion of the purposes of including land within the Green Belt when considered across the Plan area as a whole.

Canvey Island

- 3.34 The sites to the west of Canvey (GB1 and GB3) are identified as making a **moderate contribution** to Green Belt purposes overall and are located within the Canvey Island Locally Important Strategic Green Belt Area. This area is identified within the Green Belt Assessment as performing an important strategic function in managing the sprawl of development across the flat, open landscape of Canvey Island [Green Belt Assessment July 2025, [7.02](#), page 17].
- 3.35 The Council considers that this area performs a key strategic role in maintaining openness and preserving the distinction between Canvey Island and the mainland. Whilst GB1 and GB3 may make only a moderate contribution when assessed individually, their cumulative contribution to the integrity and effectiveness of the wider Green Belt area is significant.
- 3.36 This area represents the only substantial undeveloped part of Canvey Island and provides separation between Canvey Island and Benfleet to the north, as well as between Canvey Island and Thurrock to the west, including the London Gateway port and logistics area and the proposed redevelopment of Coryton refinery. Development in this location would significantly reduce the openness of the Island and would fundamentally alter the role that the Green Belt performs in preventing further outward expansion.
- 3.37 Furthermore, much of this area contains internationally designated habitats, including SPA and Ramsar sites, and performs an important role in supporting the island's drainage and flood mitigation infrastructure. These factors reinforce the strategic importance of maintaining the openness and undeveloped character of this area.

Purpose	Impact across the area of the Plan
A – To check the unrestricted sprawl of large built-up areas	The Canvey Island Green Belt prevents the urban settlement from expanding to the extent of the coastal wall or disrupting the habitats sites to the west of the island.
B – To prevent neighbouring towns merging into one another	The Canvey Island Green Belt maintains and reinforces the separation of Canvey Island from

Purpose	Impact across the area of the Plan
	Benfleet and Hadleigh on the mainland. This retains the distinct identity of Canvey Island.
C – To assist in safeguarding the countryside from encroachment	The area contains a variety of marshland, coastal landscapes and habitats which retain a predominately undeveloped character. The low lying topography results in extensive open views and large areas of openness, making the landscape particularly sensitive to encroachment.

Table 10: Canvey Island Locally Important Strategic Green Belt Area

- 3.38 The Council has concluded that release of land within the Canvey Island Locally Important Strategic Green Belt Area would fundamentally undermine the purposes of the remaining Green Belt when considered across the Plan area as a whole. Such release would reduce openness, weaken the ability of the Green Belt to contain development and erode the strategic role this area performs in maintaining the separation and distinct identity of Canvey Island.

Green Belt Areas outside of the Locally Important Strategic Green Belt Area

- 3.39 There are five parcels of the Green Belt which are not located within a Locally Important Strategic Green Belt Area. The Council has considered the impact development within these parcels would have across the area of the Plan, in accordance with paragraph 146 of the NPPF.

Parcel 2

- 3.40 Parcel 2 is not located within a Locally Important Strategic Green Belt Area. There are no sub areas within this parcel. Within the parcel is the Thundersley Great Common SSSI.

Purpose	Impact across the area of the Plan
A – To check the unrestricted sprawl of large built-up areas	Parcel 2 helps to maintain the distinction between the built up areas of Thundersley and Daws Heath and the wider countryside and helps contain outward expansion of development.
B – To prevent neighbouring towns merging into one another	Parcel 2 also contributes to maintaining separation between Thundersley and Daws Heath, and prevent them from merging with one another.
C – To assist in safeguarding the countryside from encroachment	The area contains open land, agricultural fields and undeveloped areas which retain a predominately rural character. Parcel 2 helps to protect and maintain this.

Table 11: Parcel 2

Parcel 6

- 3.41 Parcel 6 is not located within a Locally Important Strategic Green Belt Area. Site GB12 is the only sub area within the parcel.
- 3.42 Overall, GB12 makes a weak contribution to purposes A, B and C. However, as outlined in table 5 above, there are other planning reasons outside of the Green Belt considerations, which mean that this site is not considered appropriate for allocation within the Castle Point Plan.

Parcels 10a and 10b

- 3.43 Parcels 10a and 10b are not located within a Locally Important Strategic Green Belt Area. The sub-areas (GB4 and GB5) are, however, identified as serving an overall moderate purpose on the Borough's western boundary.

- 3.44 The Council recognise that these sub-areas are constrained by the highway network. However, these sub-areas cannot be viewed solely in the context of Castle Point. Cumulatively, there is a significant risk of full coalescence between towns in this area of South Essex.
- 3.45 In these circumstances, the remaining Green Belt on Castle Point's western boundary assumes increased strategic significance in maintaining the distinction between settlements and preventing the perception and reality of settlement coalescence. Further alteration of Green Belt boundaries in this location to accommodate additional housing growth would materially weaken the ability of the remaining Green Belt to perform this function.
- 3.46 When considered alongside the scale of existing and proposed Green Belt releases in neighbouring Basildon, there is clear evidence that additional releases within Castle Point would significantly undermine the collective Green Belt purpose of preventing neighbouring towns from merging and maintaining open land between settlements.
- 3.47 Consequently, altering Green Belt boundaries to meet an increase over and above the housing requirement of 6,196 homes in the Castle Point Plan would risk fundamentally undermining the purposes of the remaining Green Belt across the wider Plan area.

Purpose	Impact across the area of the Plan
A – To check the unrestricted sprawl of large built-up areas	Whilst the parcel is constrained by the highway network and does not form part of a Locally Important Strategic Green Belt Area, it continues to provide an important open area between the urban edge and the wider countryside.
B – To prevent neighbouring towns merging into one another	Parcel 10 plays an important role in preventing the coalescence of settlements on the western edge of Castle Point and within the wider South Essex context. The Green Belt in this location has increased strategic significance due to the cumulative effect of Green Belt releases in neighbouring authorities. Further erosion of the Green Belt would weaken the distinction between settlements and increase the perception and reality of settlement coalescence across Castle Point, Basildon and Rochford.
C – To assist in safeguarding the countryside from encroachment	The parcel contributes to safeguarding the countryside from encroachment by maintaining an area of open land on the Borough's western boundary. The Green Belt designation helps to prevent incremental urbanisation and protects the transition between the built-up area and the wider rural landscape.

Table 12: Parcels 10a and 10b

Parcels 14 and 15

- 3.48 The Green Belt Assessment has concluded that GB8 (the only sub area within these parcels) **makes a strong contribution overall** to the purposes A, B and C of the Green Belt [7.02, page 54, figure 14].
- 3.49 As with the Lateral Strip and the Daws Heath Ring, the Green Belt Assessment did not recommend any sub-areas for further consideration within Parcels 14 and 15.

Purpose	Impact across the area of the Plan
A – To check the unrestricted sprawl of large built-up areas	Parcels 14 and 15 help maintain the clear visual distinction between the urban areas of Hadleigh and

Purpose	Impact across the area of the Plan
	Canvey Island, as well as Hadleigh and Leigh on Sea in Southend at the strategic South Essex level.
B – To prevent neighbouring towns merging into one another	Parcels 14 and 15 make an important contribution to maintaining separation between settlements of Hadleigh, Canvey Island and Leigh on Sea in Southend. These parcels help prevent the perception and reality of settlement coalescence within Castle Point, but also with neighbouring Southend.
C – To assist in safeguarding the countryside from encroachment	The parcels contribute to safeguarding the countryside from encroachment by maintaining open land on the edge of the urban area. They help preserve the transition between the built environment and the wider rural landscape, protecting openness and preventing incremental urbanisation.
D - To preserve the setting and special character of historic towns	Although purpose D cannot be considered at the strategic level, the Lateral Strip does help maintain the rural setting of heritage assets and their setting within the Borough, notably the South Benfleet Conservation Area, Hadleigh Castle (Grade I listed) and multiple scheduled monuments (Roman Fort, Hadleigh Castle and Sandpit Hill).

Table 13: Parcels 14 and 15

Conclusion

- 3.50 Taking the evidence in the Green Belt Review 2018 [\[7.01\]](#) and the Green Belt Assessment July 2025 [\[7.02\]](#) into account, the Council is of the view that the Green Belt in Castle Point is strategically important both locally and at the South Essex level, and has acted effectively to date in containing settlements and preventing them from merging. The evidence suggests that, despite changes to the Green Belt Planning Practice Guidance in February 2025, a large proportion of the Green Belt in Castle Point continues to perform strongly against the purposes of including land in the Green Belt.
- 3.51 The combined conclusions that can be reached from the Green Belt Assessment work undertaken in 2018 and updated in 2025 are that:
- 3.51.1 The Green Belt in Castle Point is strategically important, not just at a local level, but also within South Essex. It forms part of the wider network of Green Belt across South Essex that contains individual settlements and maintains separation between different towns.
 - 3.51.2 That when taken together, all but two of the Green Belt parcels identified in the Green Belt Review 2018 strongly meet purposes A, B and/or C [\[7.01\]](#), page, 49, figure 7]. This largely remains true in respect of the sub-area assessed in the Green Belt Assessment July 2025 [\[7.02\]](#), page 54, figure 14]. On a strategic basis, the Green Belt in Castle Point is therefore strongly performing in terms of its purposes.
 - 3.51.3 Alterations to the Green Belt risk fundamentally undermining the purposes (taken together) of the remaining Green Belt, when considered across the area of the Plan. The Green Belt Assessment July 2025 identified that 14 of the sub-areas assessed are not suitable for release due to the harm that would be caused to the purposes of including land in the Green Belt. A further 5 sub-areas were not recommended in their full extent as harm could not be mitigated. Green Belt considerations alone therefore remove these sites/part sites from consideration.
 - 3.51.4 Where Green Belt sub-areas are recommended for further consideration, these sub-areas are clustered in and around strategic corridors of Green Belt [\[7.02\]](#), page 17, table 2 and page 18, figure 4]. Whilst individual sites may appear potentially acceptable when

considered only against Green Belt purposes, the cumulative impact would erode the strategic function of the Green Belt, for example through the loss of the gap between South Benfleet and Thundersley, or the highly visual sprawl of development into the open countryside on Canvey Island.

3.51.5 At a wider level, there is a risk of coalescence of whole towns along the A13 corridor if the gap between Pitsea and South Benfleet, and northwards to Wickford is not protected.

3.52 The evidence indicates that development beyond the 6,196 homes allocated in the Castle Point Plan would require Green Belt releases on a scale that would weaken the Locally Important Strategic Green Belt Areas identified in the Green Belt Assessment, erode settlement separation and reduce the strategic containment function of the Green Belt.

3.53 At that point, the character of the remaining Green Belt would materially change, such that it would no longer perform its purposes to the same degree across the Borough as a whole. This represents the tipping point at which Green Belt alteration would fundamentally undermine the purposes of the remaining Green Belt when considered across the Plan area.

3.54 There are therefore strong spatial reasons associated with Green Belt purposes A, B and C why it is not possible to meet all or more of the area's objectively assessed housing need without fundamentally undermining the purposes (taken together) of the remaining Green Belt, when considered across the area of the Plan.

Section 2 - Green Belt Purposes E – the strategic purpose

3.55 Purpose E is relevant to all Green Belt sites equally across the area of the Plan as it is strategic in nature and its relevance does not vary between different Green Belt parcels or sub-areas across the Borough, especially as the proposals for regeneration and renewal of the urban area in the Castle Point Plan are spread across the Borough.

3.56 It is not appropriate to read paragraph 146 of the NPPF in isolation in respect of Green Belt purpose E. It is necessary to consider the NPPF as a whole, as set out in paragraph 3. In relation to urban regeneration, paragraph 125 of the NPPF establishes that substantial weight should be given to the value of using suitable brownfield land within settlements for homes and other identified needs. Furthermore, it expects councils to promote and support the development of under-utilised land and buildings especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.

3.57 As set out in paragraph 3.4 above, paragraph 143 sets out the five Green Belt purposes of including land within the Green Belt. Purpose E relates to encouraging urban regeneration by encouraging the recycling of derelict and other urban land. Therefore, before advancing arguments for Green Belt release, it is necessary to consider how the inclusion of land within the Green Belt assists with urban regeneration, or otherwise.

3.58 In accordance with paragraph 124 of the NPPF, which states that strategic policies should set out a clear strategy for accommodating objectively assessed needs in a way that makes as much use as possible of previously developed or brownfield land, the Castle Point Plan reflects the NPPF's strong policy preference for making effective use of previously developed land by taking an urban-first approach when allocating sites for development.

3.59 Policies SP2 (Making Efficient Use of Urban Land and Creating Sustainable Places) and SP3 (Meeting Development Needs) within the Plan reflect this intention for prioritisation of brownfield land.

3.60 The Council is fully committed to this approach, as reflected by delivering around 1,290 homes on Council owned land as allocated in the Plan, including town centres and car parks to ensure the Borough is making the most effective use of available land.

3.61 Alongside this, the Council is preparing planning briefs to encourage the early development of sites within the Plan in private ownership. Due to Habitats Regulations requirements, which prevent the preparation of Part 2 brownfield registers for areas where a Habitats Regulations Assessment is

required, the Council is not able to include these sites on a Part 2 brownfield register. However, the Council intends to approve planning briefs as material planning considerations to provide greater certainty to the development sector that the principal of development is acceptable on these sites.

- 3.62 Separately, the Council is also bringing forward Master Plans for its larger regeneration allocations. A Vision for Hadleigh has been prepared and will be developed into a Master Plan for Hadleigh Town Centre (Policy Had1). A Master Plan for Canvey Town Centre (Policy C1) meanwhile will be brought forward over the course of 2027 alongside work on the Pride in Place Regeneration Plan for the whole of Canvey Island. Work is also already underway to develop a Master Plan and Delivery Plan for the regeneration of West Canvey (Policy C4).
- 3.63 The Council is, therefore, looking to make these urban development opportunities attractive and easier to bring forward for the development sector. This is important due to the attractive nature of greenfield sites for developers, which could be reinforced by wider economic uncertainty and market pressures.
- 3.64 The inclusion of Green Belt sites with the Plan would be contrary to purpose E in so far as it would inhibit developers' willingness to invest in urban regeneration schemes when allocated greenfield sites are available that may be less complex, costly and commercially risky to deliver.
- 3.65 To understand this further, consideration has been given to development viability.
- 3.66 A Whole Plan Viability Study July 2025 [9.39] has been undertaken for the Castle Point Plan by Porter Planning Economics and Urba. This builds on previous work undertaken for Castle Point for putting a Community Infrastructure Levy³ in place in 2023.
- 3.67 The Council has a CIL charge in place of £250psm for houses in Benfleet, Hadleigh and Thundersley, but was only able to introduce a charge of £90psm in place for flatted developments in the same area. On Canvey Island, houses on greenfield sites attract a charge of £120psm, whereas flats and brownfield developments attract £30psm.
- 3.68 It is therefore evident that greenfield developments in Castle Point are considerably more viable than brownfield developments.
- 3.69 Brownfield sites across the Borough are deliverable, as demonstrated through the Viability Study July 2025 [9.39, page 66, table 6.5]. This shows that developing greenfield sites under full policy requirements secures a higher level of return than in developing brownfield sites.
- 3.70 To assist in securing brownfield delivery in Castle Point, lower affordable housing requirements need to be applied and in some cases, the market may need to strengthen over the next five years before some urban brownfield sites become viable and come forward.
- 3.71 There is therefore evidence that the Green Belt in Castle Point has a key role in fulfilling Green Belt purpose E, in terms of encouraging the recycling of derelict and other urban land in line with the requirements of the Castle Point Plan as detailed in policies SP2 and SP3.
- 3.72 By restricting development in the Green Belt within Castle Point, the Council is ensuring that Green Belt sites are not developed in preference to the urban regeneration sites identified in the Plan.
- 3.73 The allocation of Green Belt sites within the Castle Point Plan, either to meet all or more of the area's objectively assessed housing need, would fundamentally undermine purpose E. It would reduce the incentive for the development sector to bring forward more complex brownfield and regeneration opportunities where less constrained greenfield alternatives are available.
- 3.74 Such an approach would also be contrary to the requirements of the NPPF when read as a whole, particularly those policies relating to making effective use of previously developed land, supporting regeneration and prioritising sustainable patterns of development.

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<https://www.castlepoint.gov.uk/w/cil-charging-schedule>

Section 3 – Conclusion

- 3.75 The Green Belt Assessment July 2025 identifies that much of the Green Belt in Castle Point performs strongly against purposes A, B and C, either individually or as part of Locally Important Strategic Green Belt Areas.
- 3.76 Therefore, whilst the Green Belt Assessment July 2025 recommended the further consideration of some sites in the Green Belt for development purposes, the evidence shows that increasing housing provision beyond 6,196 homes as allocated in the Castle Point Plan, would require progressively greater incursions into those Locally Important Strategic Green Belt Areas that give the Green Belt its wider strategic function.
- 3.77 The consequence would not simply be the loss of additional sub- areas, but the erosion of the strategic coherence of the Green Belt network across the Borough.
- 3.78 In particular, additional releases would:
- further weaken the Central Corridor between South Benfleet and Thundersley
 - diminish the openness of the western Green Belt in the context of existing and proposed growth pressures in Basildon
 - increase development pressure on the open landscapes surrounding Canvey Island.
- 3.79 These areas individually and collectively perform the key Green Belt functions of containing settlement sprawl, maintaining separation between settlements and safeguarding the countryside from encroachment. Their value lies not solely in individual parcels, but in how they operate across the plan area.
- 3.80 The scale of release required to move from 6,196 homes towards the Standard Method figure of 11,662 homes is significant. Approximately 341.6 ha of additional Green Belt land would need to be released from the Green Belt, representing around 13.7% of the Borough's Green Belt.
- 3.81 Such a reduction would extend well beyond limited boundary adjustments and would represent a substantial reconfiguration of the Green Belt across Castle Point. The Council considers that a loss of this magnitude would materially diminish the ability of the remaining Green Belt to achieve the purposes set out in paragraph 143 of the NPPF when those purposes are considered together.
- 3.82 Furthermore, the evidence on viability demonstrates that greenfield development generally offers a stronger development return than regeneration and brownfield sites within Castle Point. In these circumstances, extensive additional Green Belt allocations would risk undermining the delivery of the brownfield and urban regeneration led strategy of the Castle Point Plan by reducing the incentive to bring forward previously developed land.
- 3.83 This reinforces the Council's conclusion under Purpose E.
- 3.84 Taking all the evidence together, the Council's view is that the figure of **6,196 homes represents the maximum level of growth that can be accommodated without fundamentally undermining the purposes of the remaining Green Belt across the Plan area.** Beyond that point, the cumulative loss of Green Belt land, the weakening of Locally Important Strategic Green Belt Areas, the increased risk of settlement coalescence, and the adverse effect on urban regeneration would fundamentally alter the role and effectiveness of the Green Belt as a whole.
- 3.85 Accordingly, there is clear evidence that altering Green Belt boundaries to deliver more than 6,196 homes would fundamentally undermine the purposes, taken together, of the remaining Green Belt when considered across the area of the Plan.