



CANVEY GREENBELT CAMPAIGN

Castle Point Borough Council Plan

Inspectors Initial Matters Issues and Questions

June 2026

Submission of:

Graham Bracci, Canvey Island Resident

Stephen Sawkins, Canvey Island Resident

Web: canveygb.wordpress.com Email: [REDACTED]



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We wish to participate at the Initial Hearings having made relevant duplicated representations Reg 19 Consultation submissions (0219) and (0220).

Our issues relate to Question 1a) with particular relevance of constraints to development exercised by the Local Authority.

Our concern is in regard to the constraints, related to flood risk, not being exercised by the Local Authority.

The Inspectors make reference to the DCA Green Belt Study. We note the omission of a Green Belt Assessment of the largest site within the local authority area. This we feel is a strategic flaw which in turn has influenced the Plan's Spatial Strategy.

Another of our concerns is the relative weight given to different constraints, in particular where flood risk is concerned. Flood risk constraints only considers Flood Zone 3b, disregarding the direction given by footnote 7 of the NPPF.

Whilst we appreciate that the Inspectors are questioning policies leading to the under delivery of housing needs, what must not go unobserved is that the same policies severely limited the undertaking of flood risk Sequential Testing, which in turn has affected the distribution of development.

The council's absolute policy of zero green belt release, has rendered ineffective, the Sequential Test at the plan-making stage of housing growth distribution.

By excluding all Green Belt land at the outset, the Council removed every lower-risk alternative to Flood Zone 3a.

This made it impossible to compare sites based on flood risk, as required by national policy. The result was a self-created constraint that forced the intensification of development on the potential high flood risk area of Canvey Island, not because it was the safest or most appropriate location, but because the Council's own policy choice eliminated all safer options, where flooding is not a significant issue.

At 6.05 of our Reg 19 submissions engage on such issues.

"6.05 With this in mind, we remain concerned by the methodology employed by Castle Point Borough Council in their application of the Sequential Test regarding development on Canvey Island. The Urban development only policy, effectively removes extensive option for sequentially testing alternative sites at other areas of the borough"

We thank you for considering our request.

Stephen Sawkins

Graham Bracci

Word Count Total: 366

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