

The background image shows a coastal scene. On the right, a portion of a light-colored wooden house with a chimney and a window is visible. A wooden fence runs diagonally across the middle ground. To the left of the fence is a grassy field leading down to a rocky shore. In the distance, there are cliffs and the sea under a clear blue sky.

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PARTNERS IN PLANNING

Kings Park Village

Local Plan Representations – Matter 1 Submission

Kings Park Village, Canvey Island, SS8 8HE

Date: 31/07/2025

1 Introduction

- 1.1 This statement is submitted by Laister Planning Ltd on behalf of Cove UK in response to Matter 1 into the Examination of the draft Castle Point Local Plan. It should be read alongside Cove UK's Regulation 19 representations (Reg 19 Reps) concerning land east of Kings Park Village (KPV), Canvey Island, formerly identified as allocation HO31 in the previous draft 2018 Local Plan.
- 1.2 Cove UK's Reg 19 Reps raised two concerns. It challenged the omission of the land east of KPV in the submitted Plan and, it questioned whether the Council had adequately justified a housing requirement that falls substantially below the Borough's identified housing need. This statement develops the second of those concerns.
- 1.3 Whilst the purpose of the initial hearing sessions is not to determine the merits of individual sites, the Inspectors have made clear that Matter 1 concerning whether additional housing sites could appropriately be allocated to meet more of the Borough's objectively assessed housing need should be addressed. The individual case for or against sites will be considered at a later stage if the examination continues.
- 1.4 This statement is not asking the Inspectors, through Matter 1, to determine that HO31 should be allocated. The site is referred to as a case study as its treatment illustrates a wider concern about the robustness of the Council's Green Belt evidence and the effect that evidence has had on the proposed housing requirement.
- 1.5 The key concern relates to the Council's proposed housing requirement depends on its conclusion that there is insufficient suitable land to accommodate materially more housing. If the assessment of Green Belt capacity is incomplete, inconsistent or in some other way deficient, the resulting assessment of housing capacity will also be unreliable. HO31 provides a clear example through which that issue can be examined.



2 Response to Question 1

- 2.1 As set out in our Reg 19 Reps Para 4.14, the standard method housing need for the Plan period is 11,662 dwellings. Policy SP3 proposes a housing requirement of 6,196 dwellings, which would meet 52% of that need, about half of the identified housing need. As such the Inspectors' Initial Note records significant concerns regarding the soundness of the Plan in respect of housing requirement and supply. The Inspectors also note that it was not clear from the submitted evidence that any of the relevant exceptions in the NPPF applied so as to justify the scale of the shortfall.
- 2.2 The Council's proposed requirement is dependent on its conclusion that additional land within the Green Belt cannot appropriately be allocated. The soundness of the housing requirement therefore depends on the quality and reliability of the evidence used to assess the amount of land that could reasonably accommodate development. The key concern is that the Green Belt evidence has not consistently assessed previously identified draft allocations on a sufficiently site-specific basis, particularly those which an Inspector had previously indicated were acceptable for release to provide housing.
- 2.3 For example, where a former allocation in that draft Plan has been combined with adjoining land that has different physical, environmental or Green Belt characteristics, a conclusion concerning the wider parcel does not provide a sound basis for excluding the former allocation itself.
- 2.4 Draft 2018 Local Plan Policy HO31 (see Reg 19 Reps Para 4.5) is a good example where the former allocation was previously assessed as a defined development site adjoining KPV. The current assessment did not reconsider the former allocation on an equivalent basis. Instead, the land was assessed as part of a wider area and discounted based on the characteristics of the broader parcel. It appears this is not a site-specific disagreement about HO31. It is material to the overall housing requirement. If potentially suitable land has been discounted in this way, instead of a robust assessment of the actual development site as previously allocated, the Council have understated the amount of housing that could reasonably be accommodated.
- 2.5 A housing requirement derived from an understated assessment of land capacity cannot be regarded as properly justified. Before concluding that only 6,196 dwellings can be accommodated, the Council must demonstrate that it has considered reasonable alternatives on a consistent and proportionate basis. The Council's own evidence indicates that further capacity may exist. The 2025 Green Belt Assessment identified 12 sub-areas for further consideration. It identified reduced development areas within five other sub-areas that were not recommended in their original form. Unsuitability across a sub-area does not preclude a smaller, well-defined site within it being suitable for housing.
- 2.6 The same assessment identified 19 of the 31 assessed sub-areas as potentially constituting grey-belt land. Whilst not every such area is necessarily suitable, available or deliverable, this evidence identified a substantial range of potential opportunities that



required further consideration before the Council could justifiably conclude that more housing could not be accommodated.

- 2.7 The Housing Capacity Topic Paper also identified approximately 722 hectares of Green Belt land that was (potentially) unaffected, by the Council's principal strategic constraints. The Council acknowledged it had not individually assessed all those areas to determine their suitability to accommodate development. A broad constraints exercise can identify areas where development may be more difficult, but it cannot replace a detailed assessment of individual sites, on which allocations can be based. It does not establish whether a particular site could be brought forward through amended boundaries, a reduced development area, suitable mitigation, infrastructure improvements or compensatory Green Belt measures.
- 2.8 The evidence therefore does not demonstrate that the Council completed the detailed work necessary to establish that more housing could not be accommodated. The conclusion that the Borough can provide for only 6,196 dwellings appears to have been reached before all reasonable opportunities had been assessed with sufficient precision. The Council's own consideration of potential capacity also shows a material gap between the opportunities initially identified and the strategy. The Topic Paper referred to other sites with potential capacity for approximately 3,792 dwellings. Following consideration of transport evidence, the potentially available area was reduced to approximately 96 hectares, equating to about 2,880 dwellings. Despite that residual capacity, the Council chose not to release Green Belt sites for housing, including the former allocation at HO31.
- 2.9 Transport constraints are relevant in Castle Point, and this matter should not be understated. However, the existence of congestion does not, without further analysis, establish that additional development cannot be accommodated. The SYSTRA assessment identified considerable challenges for the operation and resilience of the transport network, but it also identified sites with greater potential for modal shift and stated that further detailed appraisal would be required if sites were taken forward. That does not mean all further Green Belt development is unacceptable – only that additional assessment and mitigation would be needed. A positively prepared Plan should examine whether transport constraints can be addressed through the distribution and scale of development, site-specific mitigation, improved public transport and active travel, infrastructure contributions and coordinated delivery.
- 2.10 The Council's approach appears to have treated the identified transport issues as a reason to avoid further Green Belt allocations, rather than as a matter to be addressed through the plan-making process. That approach risks allowing an existing infrastructure problem to determine the housing requirement without adequately considering whether development could contribute towards the necessary improvements. We consider that the Plan has not been positively prepared. The Council has not demonstrated that it has sought to meet as much of the identified housing need as could reasonably be accommodated following a complete assessment of the available alternatives.



- 2.11 The housing requirement has not been justified because the evidence does not establish that 6,196 dwellings represent the most appropriate strategy when considered against reasonable alternatives involving selective Green Belt releases. The Council's own evidence identified areas for further consideration, but the Plan does not adequately explain why the available opportunities could not contribute to a higher housing requirement. Nor has the requirement been shown to be consistent with national policy. The evidence does not demonstrate that the adverse impacts of accommodating more housing would significantly and demonstrably outweigh the benefits when assessed against the Framework. Given the scale of unmet need, that balance must be clearly evidenced rather than assumed.



3 Response to Question 1(a)

- 3.1 The Green Belt Assessment identified several sub-areas requiring further consideration which meant that the Council needed to undertake a sufficiently detailed assessment before concluding that none of those opportunities should be taken forward. We consider that the submitted evidence fails to demonstrate that each opportunity was individually assessed against the full range of relevant considerations. Those considerations include the appropriate extent of the development area, whether a smaller site could reduce Green Belt harm, the strength and permanence of potential boundaries, the scope for mitigation, transport and accessibility measures, compensatory improvements and the benefits of meeting additional housing needs.
- 3.2 HO31 demonstrates why that site-specific approach is necessary. The 2018 Green Belt evidence assessed a defined area adjoining KPV. The site was proposed for approximately 50 dwellings. The Green Belt Review concluded that development would not have a significant impact on the Green Belt, would not reduce the robustness of the Green Belt boundaries and would represent a limited lateral extension to the existing settlement.
- 3.3 The site was and remains physically contained. The intertidal habitat and reclaimed landfill were identified as features that would restrict further expansion. The previous assessment therefore did not regard the site as creating an opportunity for unrestricted development into the wider Green Belt. The previous Inspector accepted that development would cause some loss of openness and minor harm to the purposes of checking unrestricted sprawl and safeguarding the countryside. However, the Inspector also found that the site boundaries were well defined by the coastal wall and Canvey Heights Country Park and were likely to be permanent. Subject to appropriate policy requirements, the overall harm was found to be minor.
- 3.4 The above conclusions remain relevant to the current examination. They do not require the Council to retain HO31 as an allocation indefinitely, and they do not prevent a different conclusion being reached with updated evidence. They do, however, require the Council to explain clearly why the earlier site-specific conclusions no longer apply.
- 3.5 The current evidence does not provide that explanation as the former HO31 allocation was not reassessed using equivalent boundaries. Instead, it was considered together with additional land that has different characteristics. A conclusion concerning the Green Belt performance or suitability of the wider area cannot establish that the former allocation is unsuitable.
- 3.6 A larger parcel may perform a stronger Green Belt function because it includes open or sensitive land that was never proposed for development. Assessing the wider parcel can therefore produce a different outcome from an assessment of the smaller, contained area that formed the former allocation. The Council has not demonstrated that the former HO31 boundaries are no longer permanent or defensible. It has not explained why the previous assessment of minor harm is no longer applicable. Nor has it shown that a reduced or amended site could not be considered, or that any current constraints could not be addressed through mitigation and appropriate policy requirements.



- 3.7 The significance of HO31 is therefore methodological. The site would not, on its own, resolve the Borough's housing shortfall. It does, however, show how potential housing capacity may have been excluded because of the way the current assessment defined and considered larger parcels.
- 3.8 There is a reasonable concern that the same issue could affect other sites previously identified for Green Belt release. The Council must therefore explain, through a consistent and proportionate assessment, why previous sites that were considered appropriate for release should now be excluded. The fact that a new assessment has been prepared does not displace the earlier findings. There must be a clear explanation of any relevant change in circumstances, evidence or methodology.
- 3.9 On the evidence currently available, the constraints identified by the Council do not justify the exclusion of every site recommended for further consideration. At most, they identify matters that require further site-specific investigation. They do not establish that all additional Green Belt development is unacceptable within the Plan period.



4 Response to Question 1(b)

- 4.1 It is agreed that the release of undeveloped Green Belt land will inevitably result in some loss of openness and may affect one or more Green Belt purposes however, Council should consider whether altering the Green Belt boundaries to meet more of the identified housing need would fundamentally undermine the purposes of the remaining Green Belt when considered across the Plan area as a whole. This requires the Council to demonstrate the harm is greater than that arising from individual sites. It must show that the scale, location and cumulative effect of additional releases would compromise the overall function of the Green Belt across the Plan area. The submitted evidence does not demonstrate that the selective release of appropriately defined sites would fundamentally undermine the remaining Green Belt.
- 4.2 The previous examination is relevant in this respect as the Inspector had previously concluded that the proposed Green Belt alterations would have relatively limited impacts on openness, would have localised effects and would not cause severe or widespread harm to Green Belt purposes. Exceptional circumstances were found for the release of several sites adjoining existing urban areas, including HO31. Those findings were made in the context of an earlier Plan (and NPPF criteria) and do not determine the outcome of the present examination. Nevertheless, they are relevant evidence that a strategy involving the selective strategic release of a number of Green Belt sites was capable of being pursued without fundamentally undermining the Green Belt as a whole.
- 4.3 HO31 is a clear example as a former allocation was found to cause only minor harm. Its boundaries were considered well defined and likely to be permanent. Development would have formed a limited extension adjoining an existing settlement, rather than unrestricted expansion into the wider countryside. The Council has not identified a material change in characteristics of the site that would justify disregarding those earlier findings. Nor has it demonstrated that the selective release of HO31 and other comparable sites would cumulatively result in severe or widespread harm.
- 4.4 The assessment identifies a number of sub-areas requiring further consideration, including smaller development areas that could reduce Green Belt harm. It also identified areas of potential grey belt. The Topic Paper identified land that was (potentially) unaffected by the Council's principal strategic constraints, while acknowledging that the suitability of those areas had not been individually assessed. We consider that evidence does not establish that all of the identified land should be developed. It does, however, show that potential opportunities remained to be assessed in greater detail. The Council could not reasonably conclude that selective Green Belt release would fundamentally undermine the remaining Green Belt without first completing that site-specific assessment.
- 4.5 The appropriate approach is to distinguish between land that makes a strong and strategically important contribution to the Green Belt and land where the effects of release would be localised, limited or capable of mitigation. That requires careful consideration of individual site boundaries, their relationship with existing settlements, the strength of



proposed replacement boundaries and the cumulative effect of release across the Borough.

- 4.6 The Council's evidence does not show that this exercise was completed with sufficient precision before the housing requirement was fixed. Instead, the housing requirement appears to have been determined based on broad constraints and larger assessment parcels that may have concealed opportunities for smaller and more contained releases. We therefore consider that there is no clear evidence that altering Green Belt boundaries to provide more housing would fundamentally undermine the purposes of the remaining Green Belt across Castle Point.



5 Overall conclusion

- 5.1 Our position remains consistent with our Regulation 19 representations. The proposed housing requirement falls substantially short of the identified need and has not been adequately justified through the Council's assessment of Green Belt capacity and other constraints.
- 5.2 The treatment of HO31 demonstrates the problem. A defined site that was previously found to cause only minor Green Belt harm and to have permanent and defensible boundaries, and it was suitable for release from the Green Belt to provide housing to meet identified needs. It has not been reconsidered on an equivalent site-specific basis. The current assessment of a wider area does not provide an adequate explanation for excluding the former allocation.
- 5.3 The Council's own evidence identified sub-areas for further consideration, reduced development opportunities, potential grey-belt land and residual housing capacity. It does not demonstrate that all of those opportunities were subjected to the detailed assessment necessary to conclude that more housing could not be accommodated.
- 5.4 Nor does the evidence establish that selective Green Belt release would fundamentally undermine the purposes of the remaining Green Belt. Previous findings demonstrate that a number of contained releases could result in localised and limited harm without causing severe or widespread harm across the Borough. The Plan has therefore not been shown to be positively prepared, justified or consistent with national policy in respect of its housing requirement.
- 5.5 To address the identified soundness concerns, the Council should reconsider the Green Belt assessment methodology and the boundaries of the parcels used. It should undertake a site-specific reassessment of previously identified development opportunities, consider whether reduced development areas and appropriate mitigation could enable additional sites to come forward, and review the amount of housing that can reasonably be accommodated.





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