



Castle Point Local Plan

Local Plan Examination Optional Hearing Statement

July 2026



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Question 1: Do the constraints identified by the Council justify not allocating each of the sites for housing development recommended for further consideration by the DAC Green Belt study, including sites which already have planning permission.

- 1.1.1** The constraints identified by the Council do not justify the exclusion of sites recommended for further consideration through the DAC Green Belt Study, including sites that already benefit from planning permission. The DAC Green Belt Study identifies a total of 17 sub-areas to receive further consideration for release from the Green Belt. One of these sites was identified for employment development, whilst the remaining 16 sub-areas were identified for residential development. Of the 16 residential sites, five were recommended for further consideration only if a reduced site area was taken forward, with the Study providing new red line site boundary recommendations for these locations. These sites therefore represent land which, following detailed assessment, was considered by the Council's own evidence base to warrant further consideration through the Local Plan process.
- 1.2.1** The supporting text to Policy SP3 states that the evidence base identifies a number of constraints which, in the Council's view, prevent the Borough from meeting its full housing requirement. We disagree with this conclusion. The evidence does not demonstrate that these constraints represent overriding barriers to development or justify the exclusion of all sites identified for further consideration through the DAC Green Belt Study. As discussed throughout this representation, much of the Council's own evidence recognises that potential impacts require site-specific assessment and can often be addressed through mitigation measures and masterplanning. Accordingly, this representation categorises these into eight constraints which will be addressed in turn below.

Constraint 1: Achieving the target would significantly and irreversibly destroy large tracks of Green Belt, including land which strongly contributes to the Green Belt purposes.

1.3.1 The evidence base does not support the Council's assertion that meeting housing needs would result in the significant and irreversible loss of large tracks of Green Belt, including land that strongly contributes to Green Belt purposes.

1.4.1 The submitted Local Plan has a shortfall of 5,466 dwellings against the housing requirement identified by the Standard Method. Whilst approximately 2,500 ha of land within Castle Point is designated as Green Belt, the Council's evidence demonstrates that not all Green Belt land performs the same function or contributes equally to Green Belt purposes. The DAC Green Belt Study was specifically undertaken to identify land that may be suitable for release. The Study's recommendations were based on a detailed assessment of Green Belt purposes and concluded that the identified sites did not make a strong contribution to purposes (a), (b) and (c). Purpose (d) was not assessed due to the absence of historic towns within the Borough, whilst purpose (e) was discounted on the basis that all Green Belt land was considered to contribute equally to this purpose.

1.5.1 Furthermore, the Housing Capacity Topic Paper identifies that the sites recommended for further consideration through the DAC Green Belt Study could deliver approximately 3,792 dwellings. Based on the site areas identified by the DAC Study, delivery of this level of growth would require the release of around 175 hectares of Green Belt land, representing just over 7% of the Borough's total Green Belt area. Such a release cannot reasonably be characterised as the loss of large tracks of Green Belt, particularly where the sites have already been assessed and identified as making a comparatively limited contribution to Green Belt purposes.

1.6.1 The evidence base also demonstrates that the Council discontinued its assessment of Green Belt release once it became apparent that the identified sites would not meet the housing requirement in full. However, the fact that the initial tranche of sites would not address the entire need does not justify their exclusion. On the contrary, those

sites would make a substantial contribution towards housing delivery and significantly reduce the housing shortfall. The Council has not adequately explored whether further Green Belt releases could address the remaining deficit of approximately 1,664 dwellings.

- 1.7.1 Consequently, it is clear that the Council has not demonstrated that allocating the sites identified for further consideration through the DAC Green Belt Study would result in the significant and irreversible loss of large tracts of Green Belt, nor that such sites make a sufficiently strong contribution to Green Belt purposes to justify their exclusion. Rather, the evidence indicates that a limited and selective review of Green Belt boundaries could deliver a substantial proportion of the Borough's housing needs whilst retaining the vast majority of the Green Belt and its strategic functions.

Constraints 2: Achieving the target would undermine the approach to protecting and enhancing the natural environment set out in Policy SP1 by impacting on protected areas and frustrating a landscape scale approach to green infrastructure and nature recovery.

- 1.8.1 The Council's assertion that achieving a higher housing target would undermine Policy SP1 by impacting protected areas and frustrating a landscape-scale approach to green infrastructure and nature recovery is not supported by the Local Plan evidence base. Policy SP1 seeks to protect and enhance green and blue infrastructure, support delivery of the Essex Local Nature Recovery Strategy and secure opportunities for multifunctional green infrastructure. However, neither the policy nor the supporting evidence demonstrates that these objectives are incompatible with meeting the area's local housing need as calculated using the Standard Method.
- 1.9.1 The evidence base promotes a landscape based approach to planning where habitat creation, biodiversity enhancement and green infrastructure delivery are integrated into development proposals. The Local Wildlife Site Review identifies the need to expand habitats, create buffers and strengthen ecological networks, whilst the Essex Green Infrastructure Strategy and South Essex Strategic Green and Blue Infrastructure Study advocate the delivery of strategic, connected green infrastructure networks

alongside planned development. Furthermore, the Housing Capacity Topic Paper acknowledges that environmental constraints exist on a spectrum, acknowledging that not all constraints carry equal weight or represent absolute barriers for development. Therefore, Gladman does not accept that meeting the area's local housing need would undermine the objectives of Policy SP1. Strategic Green Belt releases would provide an opportunity to deliver comprehensively masterplanned developments incorporating substantial green infrastructure, habitat creation, biodiversity net gain and enhanced ecological connectivity on a scale that is unlikely to be achievable on smaller urban sites. This approach would be entirely consistent with the aims of Policy SP1 and the wider evidence base.

1.10.1 The Council's evidence does not support the conclusion that environmental considerations justify the exclusion of Green Belt land from development. The DAC Green Belt Study confirms that the sub-areas identified for further consideration are not affected by Footnote 7 designations and demonstrates that these areas comprise Green Belt land performing either weakly or moderately against the purposes of the Green Belt. Therefore, these sites fall within the definition of Grey Belt as set out in national policy and should have been assessed on the basis of whether any site-specific constraints constitute strong reasons for refusing development. The Council's own evidence does not demonstrate that the identified areas are subject to constraints that require them to be discounted, and that many of the potential constraints require site-specific assessment and consideration of mitigation measures. The Council has therefore not provided adequate justification for excluding these sites from allocation due to environmental considerations or Policy SP1, especially where they have been identified through its own evidence base as suitable for consideration.

1.11.1 Furthermore, the environmental constraints identified by the Council also do not justify the omission of sites recommended for further consideration through the DAC Green Belt Study. Whilst the Housing Capacity Topic Paper identifies a range of constraints, it also recognises that their significance varies, and that they do not necessarily prevent development from coming forward. The Council therefore accepts

that many constraints can be addressed through appropriate mitigation measures and that site-specific assessment is required to determine development potential. This approach is consistent with comments within the evidence base, which advise against equating Green Belt designation to biodiversity value. As discussed in the evidence base, not all Green Belt land is of high ecological value and Green Belt designation does not necessarily correlate with biodiversity value. The habitat value of a site should be evidenced rather than assumed and directing development away from suitable Green Belt sites could, in some circumstances, result in allocations being located closer to nationally or internationally designated ecological sites. Therefore, the habitat value of land should be evidenced through assessment rather than assumed based on Green Belt designation alone, which reinforces the need for a site-specific assessment of environmental impacts, undermining suggestions that Green Belt release is inherently incompatible with biodiversity, nature recovery or green infrastructure delivery.

1.12.1 The evidence base does not demonstrate that development of the site identified would cause unacceptable harm to protected habitats, ecological networks or nature recovery objectives, nor that any potential effects could not be appropriately managed through masterplanning, green infrastructure provision, biodiversity enhancements and site-specific mitigation. The Housing Capacity Topic Paper confirms that strategic habitat creation opportunity areas are not automatically precluded from development, that landscape sensitivity alone is not a compelling reason to resist development, and that matters relating to flood risk and heritage require site-specific assessment. There is no robust evidence to demonstrate that meeting the area's housing needs is incompatible with Policy SP1 or that the identified environmental considerations justify excluding suitable Green Belt sites identified through the Council's own evidence base. Therefore, the planned release of appropriate Green Belt land plays a positive role in delivering strategic green infrastructure and nature recovery objectives.

1.13.1 The Council has not provided sufficient evidence to justify relying on Policy SP1 to constrain the delivery of its full housing need or to exclude suitable Green Belt sites

identified through its own assessments. As such, this approach is not justified, is inconsistent with the evidence base, and fails to support a positively prepared strategy for meeting identified development needs.

Constraint 3: Green spaces and Green Gaps are also critical to the wellbeing of residents and to the character of the settlement within the borough.

1.14.1 Whilst Green Spaces and Green Gaps are important considerations for residents' wellbeing and settlement character, the Council has not demonstrated that the exclusion of sites identified through the DAC Green Belt Study is justified on this basis, including on sites that already benefit from planning permission.

1.15.1 The Council's evidence base does not identify Green Spaces or Green Gaps as absolute constraints to development and supports a plan-led approach whereby development is integrated with green infrastructure, public open space, biodiversity enhancement and landscape improvements. Opportunities to enhance green infrastructure networks and accessibility to open space through planned development are identified and it is recognised that these objectives can be delivered alongside this growth. The evidence acknowledges that the health, wellbeing and recreational benefits associated with green infrastructure can be maintained and enhanced through new development rather than being reliant on the preservation of land in its current form. Furthermore, it is acknowledged that landscape sensitivity is only one consideration in determining suitability for development. The evidence base identifies opportunities for landscape enhancement and confirms that wider planning factors including design, infrastructure, ecology and sustainability are also considerations.

1.16.1 The Council's assessment does not conclude that the majority of Green Belt sites are unsuitable for development with most identified as having either medium-low or medium sensitivity to built development, demonstrating a capacity to accommodate development without significant adverse landscape effects. Whilst the assessment does identify constraints, these matters can be addressed through site-specific masterplanning, structural landscaping, green infrastructure provision, the retention

of key landscape features and appropriate design measures. Although some sites contribute to the character of settlements or help maintain separation between built-up areas, the evidence does not demonstrate that development would be unacceptable in principle and identifies that specific features can be suitably retained, enhanced and incorporated into development proposals.

1.17.1 Strategic Green Belt releases also provide an opportunity to deliver significant areas of publicly accessible open space, green corridors, recreational facilities and biodiversity enhancements, thereby making a positive contribution to residents' wellbeing whilst reinforcing local landscape character and sense of place. Such benefits are often more readily achievable through comprehensively masterplanned urban extensions than through the development of smaller urban sites.

1.18.1 Consequently, the Council's evidence does not demonstrate that Green Spaces and Green Gaps represent sufficient constraints to justify the exclusion of sites recommended for further consideration through the DAC Green Belt Study. The evidence supports a landscape-led approach in which development is carefully planned to protect important features, maintain appropriate separation where necessary and deliver significant green infrastructure and public open space alongside housing growth. Accordingly, the Council has not demonstrated that the allocation of sites identified through the DAC Green Belt Study would result in unacceptable harm to residents' wellbeing or the character of settlements within the Borough such that their exclusion from the development strategy is justified.

Constraint 4: Heritage Impact Assessments have highlighted the potential impact to heritage assets as a result of development

1.19.1 The Council's reliance on Heritage Impact Assessments as a justification for not meeting the local housing need is not supported by the evidence base. Heritage Impact Assessments are intended to identify potential heritage impacts and help inform how these considerations can be avoided, minimised or mitigated through design, masterplanning and the planning process. They also do not conclude that development should not be delivered or demonstrate that housing delivery and

heritage conservation are incompatible. National policy requires a balanced judgement to be made, weighing any identified heritage harm against the public benefits of development. Heritage constraints do not amount to an absolute restriction on development and do not justify reducing housing provision unless it can be demonstrated that harm would be unacceptable, substantial and incapable of mitigation.

- 1.20.1 The evidence base does not demonstrate that constraints associated with heritage assets justify the exclusion of sites identified for further consideration on a site-specific basis through the DAC Green Belt Study. The need for carefully considered design, archaeological investigation or mitigation measures is not a sound reason for omitting otherwise suitable and sustainable sites from the Local Plan. This is particularly relevant where sites already benefit from planning permission, demonstrating that heritage issues have been assessed and are considered capable of being addressed through the planning application process.
- 1.21.1 Whilst heritage considerations are an important planning consideration, the evidence base does not support the conclusion that they represent a sufficient constraint to justify not meeting the Borough's local housing need. In fact, Heritage Impact Assessments actually demonstrate how heritage considerations can be managed through appropriate design and mitigation, allowing both housing delivery and heritage conservation objectives to be both achieved.

Constraint 5: From transport modelling the road network in Castle Point operates at capacity already and the impacts of growth would be severe. It notes that accessibility issues with sites within the Green Belt would act to worsen the situation without being able to provide the levels of mitigation necessary to reduce impacts on the strategic road network.

- 1.22.1 The transport evidence provided does not justify the exclusion of the sites identified for further consideration through the DAC Green Belt Study. Whilst the Housing Capacity Topic Paper concludes that additional development could exacerbate existing congestion and that sustainable travel measures may not achieve

the desired modal shift, the evidence does not demonstrate that the impacts arising from development on the identified Green Belt sites would be incapable of mitigation or that all such sites should be excluded from allocation.

- 1.23.1 The Council commissioned SYSTRA to undertake a Green Belt Site Assessment of potential Green Belt release sites. The assessment applies a density of 40 dwellings per hectare when calculating development capacities and associated trip generation, despite the Housing Capacity Topic Paper identifying site capacities based on 30 dwellings per hectare. This results in a higher level of assumed development and associated vehicle movements than that relied upon elsewhere in the Council's evidence base.
- 1.24.1 Furthermore, whilst the SYSTRA Assessment assumes that individual Green Belt sites would have a limited ability to support significant improvements to public transport provision, it also acknowledges that further work was being undertaken to identify additional public transport improvements capable of achieving a greater reduction in car-based trips and to explore further mitigation opportunities associated with the sites. However, this work does not appear to have been completed or incorporated into the evidence base. The Council has therefore relied upon an incomplete assessment of potential mitigation measures.
- 1.25.1 It is also notable that the SYSTRA Assessment identifies a number of sites as being capable of accommodating development in a manner consistent with the requirements of paragraphs 110 and 115 of the NPPF, subject to further work. However, there is no evidence that this additional assessment has been undertaken. The Council has therefore not demonstrated that the identified transport constraints cannot be addressed through further site-specific design, mitigation and infrastructure improvements.
- 1.26.1 The limitations of the assessment are further illustrated by Site GB4 (Land off Glebelands), which the SYSTRA Assessment identifies as being unable to satisfy the relevant transport requirements of the NPPF. However, the site is currently subject to an active planning application (25/0779/OUT) and Essex County Council, in its role as

Highway Authority, note that the submitted Transport Assessment provides a robust assessment of the highway network and demonstrates only a limited impact on local junctions. Essex County Council further concluded that, subject to appropriate contributions towards bus infrastructure and services, there were no overriding concerns regarding access arrangements or the impact of the development on the highway network. This appears inconsistent with the conclusions reached within the SYSTRA Assessment and demonstrates the importance of undertaking detailed site-specific assessment.

1.27.1 The Council's approach appears to assume that the existence of residual transport impacts justifies the exclusion of otherwise suitable sites. However, the planning balance requires consideration of whether any adverse impacts would significantly and demonstrably outweigh the benefits of development. The Council has not demonstrated that this test has been undertaken in respect of the sites identified through the DAC Green Belt Study, nor has it demonstrated that the transport impacts associated with those sites would be incapable of mitigation or would justify their exclusion from the development strategy.

1.28.1 Consequently, whilst transport constraints are an important consideration, the evidence does not demonstrate that they justify the exclusion of all sites identified for further consideration through the DAC Green Belt Study. Rather, the evidence points towards the need for further site-specific assessment and mitigation, including public transport improvements, highway interventions and sustainable travel measures, before any conclusion can properly be reached regarding the suitability of the individual sites for allocation.

Constraint 6: Health service provision, whilst new health facilities could be secured the local health services are unable to resource such facilities with staff.

1.29.1 The evidence relating to healthcare provision justifies the exclusion of sites identified for further consideration through the DAC Green Belt Study.

1.30.1 The Council's evidence presents inconsistent conclusions regarding the nature of the healthcare constraint. The supporting text to Policy SP3 suggests that the principal

issue relates to the ability of healthcare providers to staff additional facilities, whereas the Sustainability Appraisal identifies concerns regarding both existing healthcare capacity and the availability of physical infrastructure. In assessing the alternative options for Policy SP3 against Sustainability Objective 13, the Sustainability Appraisal notes that GP surgeries within the Borough are operating over capacity and that there is no Accident and Emergency hospital within Castle Point. Whilst it concludes that further growth could exacerbate these pressures, it also acknowledges that development may provide opportunities to address healthcare needs through the delivery of appropriate infrastructure. This indicates that additional growth is not inherently incompatible with the provision of healthcare services.

- 1.31.1 Furthermore, the Statement of Common Ground between Castle Point Borough Council and NHS Property Services does not identify Policy SP3 or housing growth as a reason for restricting development below identified housing needs. Discussions instead focus on the delivery of healthcare infrastructure through Policy SP4 (Development Contributions) and Policy INFRA3 (Improving Health and Wellbeing). This demonstrates that NHS stakeholders have engaged primarily on how healthcare infrastructure can be delivered alongside growth, rather than questioning whether growth should occur.
- 1.32.1 The Council has not provided evidence from NHS Property Services, the Integrated Care Board or other healthcare bodies demonstrating that the housing needs of the Borough cannot be met because additional healthcare facilities would be incapable of being staffed. Whilst workforce pressures may exist, these are a national issue and are not unique to Castle Point. Such matters are largely outside the control of the planning system and cannot reasonably justify restricting housing delivery where suitable land is available. Moreover, strategic allocations are capable of supporting investment in healthcare infrastructure through developer contributions and planned service expansion. The Council has not demonstrated that the sites identified through the DAC Green Belt Study would create healthcare impacts that could not be addressed through these mechanisms.

- 1.33.1 Consequently, whilst healthcare capacity is an important consideration, the evidence does not demonstrate that it represents an overriding constraint that justifies the exclusion of sites identified for further consideration through the DAC Green Belt Study. Nor has the Council demonstrated that staffing concerns are of such significance that they justify planning for substantially fewer homes than required to meet identified housing needs.

Constraint 7: not the physical or market capacity to meet the government's targets with unrealistic expectation in relation to the availability of skilled construction labour, access to materials and financial investment from developers and broader economic conditions.

- 1.34.1 The Council has provided no evidence to support the assertion that labour availability would prevent the delivery of additional housing over a plan period extending to 2043. Construction labour is not restricted to residents within Castle Point and the industry operates across the wider Essex and South East labour markets. Evidence prepared in support of development proposals within the Borough identifies that approximately 2,000 people are employed in the construction sector within Castle Point alone, indicating that construction forms an established and important part of the local economy.
- 1.35.1 The historic under-delivery of housing within the Borough is not a consequence of promoters, landowners or housebuilders being unwilling to bring development forward, it is a consequence of the Council's longstanding failure to adopt an up-to-date Local Plan and its historic resistance to Green Belt release, which has constrained the supply of deliverable housing land. The substantial number of sites promoted through the Local Plan process and the volume of planning applications submitted across the Borough demonstrate a clear willingness from the development industry to invest in Castle Point should sufficient suitable development opportunities become available.
- 1.36.1 Furthermore, evidence prepared by Gladman in support of development proposals within the Borough demonstrates the substantial economic benefits associated with

housing delivery; including investment in construction, job creation, support for local supply chains and increased consumer expenditure. Such evidence reinforces national policy objectives which identify housing delivery as a driver of economic growth and investment.

- 1.37.1 The Council's position also fails to recognise the severe affordability pressures facing the Borough. Evidence submitted in support of development proposals by Gladman shows that Castle Point has an affordability ratio of 9.31, above both the regional and national averages and substantially above the level generally associated with an affordable housing market. House prices have risen significantly in recent years, demonstrating strong and sustained demand for housing. These market signals point towards a need for increased housing supply rather than providing evidence of an employment market that lacks the capacity to absorb additional development.

Constraint 8: Duty to Cooperate

- 1.38.1 Matters relating to the Duty to Cooperate do not justify the exclusion of sites identified for further consideration through the DAC Green Belt Study.
- 1.39.1 The Council has engaged with neighbouring authorities regarding opportunities to accommodate unmet housing needs arising within Castle Point. However, Statements of Common Ground with Thurrock, Rochford, Brentwood and Southend-on-Sea confirm that those authorities are unable to assist in addressing Castle Point's housing needs. Most recently, following discussions on 22nd June 2026, Thurrock Council advised that it was very unlikely that any capacity would arise through the Thurrock Local Plan that could contribute towards meeting Castle Point's unmet housing need.
- 1.40.1 Whilst this demonstrates that neighbouring authorities are unable to accommodate Castle Point's unmet need, it does not provide justification for planning for a lower housing requirement or for excluding sites identified through the Council's own evidence base as suitable for further consideration. The absence of available capacity elsewhere reinforces the need for Castle Point to maximise opportunities to meet its housing needs within its own administrative area.

- 1.41.1 The DAC Green Belt Study identifies a number of sites capable of accommodating development and recommended them for further consideration through the plan-making process. As neighbouring authorities are unable to assist in meeting unmet housing needs, the Council should fully consider reasonable opportunities within the Borough before concluding that housing needs cannot be met.

Question 1b: 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?

- 1.42.1 There is not the clear evidence provided by the Council that altering Green Belt boundaries to meet all or more of the area's objectively assessed housing need would fundamentally undermine the purposes of the remaining Green Belt when considered across the plan area.
- 1.43.1 The Council's own DAC Green Belt Assessment was undertaken to identify Green Belt sites that may be appropriate for further consideration through the Local Plan process. The assessment identified 16 sub-areas for further consideration for residential development, with five requiring amendments to the site boundaries. The assessment includes an assessment of the sites individual impact on the wider Green Belt which concludes that the release of these sub-areas would be unlikely to significantly harm the performance of the wider Green Belt.
- 1.44.1 Whilst the DAC Assessment acknowledges that cumulative impacts may need to be considered where sites are located in close proximity, it does not undertake a cumulative assessment and does not conclude that the release of the identified sites would fundamentally undermine the Green Belt. It simply notes that a different conclusion may be reached when sites are considered cumulatively. The report therefore provides no evidence that the cumulative release of the identified sites would result in unacceptable harm to the overall function of the Green Belt.

- 1.45.1 Importantly, the DAC Assessment explicitly recognises that the test within paragraph 146 of the NPPF is most appropriately applied at the plan-making stage, as it requires consideration of the cumulative implications of the Council's preferred spatial strategy and proposed allocations across the plan area. Consequently, the site-level assessments themselves cannot be relied upon as evidence that meeting housing needs would fundamentally undermine the remaining Green Belt.
- 1.46.1 Furthermore, none of the other evidence base documents provides the required assessment. Whilst the Sustainability Appraisal refers to the importance of the Green Belt and notes that many Green Belt parcels perform one or more Green Belt purposes to a strong or very strong degree, this analysis relates to broad Green Belt parcels rather than the smaller sub-areas assessed through the DAC Study. The Sustainability Appraisal does not undertake a specific assessment of whether the release of the sites identified through the DAC Assessment would fundamentally undermine the purposes of the remaining Green Belt across the Borough. Similarly, neither the Housing Capacity Topic Paper nor any other supporting evidence provides such an assessment.
- 1.47.1 Therefore, whilst the evidence base identifies that Green Belt release may give rise to some degree of harm, this is not the test set out in paragraph 146 of the NPPF. The question is whether meeting development needs in full would fundamentally undermine the purposes of the remaining Green Belt when considered across the plan area. The Council has not produced clear evidence demonstrating that this would be the case.
- 1.48.1 This is at odds with the work undertaken by the Council with regards to previous Core Strategy and Local Plan attempts who have found time and again that Green Belt development should be released and can be released without impacting on the wider Green Belt. In 2006 the Council identified that with an annualised target of just 200 homes per annum exceptional circumstances could be demonstrated that justified alteration to the extent of the Green Belt,

- 1.49.1 The Castle Point Draft New Local Plan 2011-2031 again identified that exceptional circumstances existed to enable an alteration to Green Belt boundaries. This included land at Glebelands for release, as part of the evidence base a Green Belt Boundary Review (November 2013) was undertaken which identifies the site as having an Amber Green Belt rating which would result in medium Green Belt Impacts.
- 1.50.1 The next attempt to produce a local plan also recognised that exceptional circumstances existed to justify the alteration of the Green Belt Boundaries. This time the plan moved through examination and was found sound by the Inspector. The Inspectors report acknowledges the pressing housing need, both market and affordable which Castle Point faces. The Inspector recognised that, as now, the council had no opportunity to export housing need to another district, additionally only 53% of the housing need could be met within the existing urban area. This leads to the conclusion that it was not possible to rely on increasing the supply of housing within the urban area to avoid the need to alter boundaries of the Green Belt to meet housing need. Overall, there were strategic-level exceptional circumstances to alter the Green Belt boundary to meet housing needs. The situation has not changed, in fact the delivery of housing both market and affordable within the authority has worsened in recent years, with only 21 net additional dwellings delivered in 2024/25, the Housing Capacity Topic Paper (August 2025) notes that this poor deliver "serves to underline the difficulty in meeting such high delivery rates in the Borough." The difficulty is not as a result of an increased housing figure, the Council have failed to deliver against any housing requirement the Council have ever been set, this has been caused by an inability to adopt a Local Plan since 1998 due to a reticence to release suitable and sustainable Green Belt sites despite them being found sound by a previous Inspector.
- 1.51.1 With direct reference to Land at Glebelands (which was again identified for release and residential development within the Local Plan) the inspector concluded that "Given the need for housing which cannot be accommodated within the existing urban area and the limited harm to the Green Belt, I find that there are exceptional circumstances for changing the Green Belt boundaries as proposed". When referring

to other Green Belt sites it was clear that the impact on the wider Green Belt network had been considered and found to be acceptable to enable the release of Green Belt land.

1.52.1 There is therefore a history of the Council themselves and Inspector's identifying that due to the authority being unable to meet the housing need within the existing urban area or in neighbouring authorities that Green Belt development should be released.

1.53.1 Looking to the impact on the Green Belt itself it should also be noted that the Green Belt within Castle Point area is part of the wider London Metropolitan Green Belt, this was established to check further growth of large built-up areas, prevent neighbouring towns from merging into one another and to preserve the special character of a town. Over the decades the Green Belt has increased markedly and now represents an area over three times that of the current Greater London Authority Boundary. The figure below demonstrates the full extent of the London Metropolitan Green Belt.

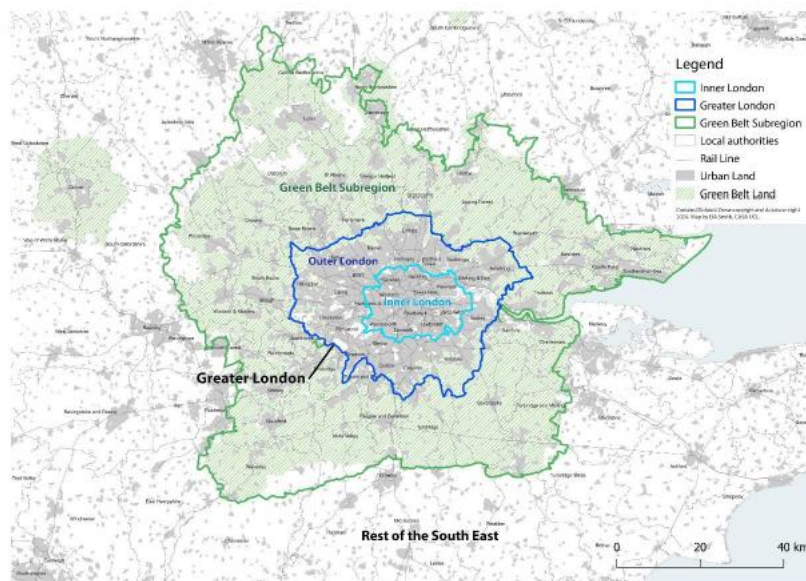


Figure 1: Map of the Green Belt Subregion in London and the South East

1.54.1 Not only is it clear that the release of sites within Castle Point Local Plan Area would not result in large swathes of the Green Belt being lost, but in terms of across the entirety of the London Metropolitan Green Belt it is clear only a tiny fraction of this Green Belt would be released to enable Castle Point to meet its overall housing requirements and would not negatively impact upon the wider Green Belt.

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- 1.55.1 In conclusion, the Council's own evidence identifies a number of Green Belt sites capable of accommodating development and acknowledges that Green Belt boundaries may be reviewed through the plan-making process. Accordingly, Gladman does not consider that the Council has demonstrated that meeting the area's objectively assessed housing need through a selective and plan-led review of Green Belt boundaries would fundamentally undermine the purposes of the remaining Green Belt.