



Examination of the Castle Point Plan

HEARING STATEMENT ON BEHALF OF HILLSIDE ENTERPRISES

Matters, Issues and Questions - Matter 1



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1.1 INTRODUCTION

- 1.1.1. This Statement has been prepared by WSP on behalf of Hillside Enterprises in response to the Inspectors' Initial Matters Issues and Questions (MIQs). This submission responds to the specific MIQs considered to be relevant to points made in the Regulation 19 representations originally submitted in September 2025 and resubmitted in November 2025.

1.2 MATTER 1 – HOUSING REQUIREMENT AND PROVISION

Question 1 - 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?

- a) Do the constraints identified by the Council justify not allocating each of the sites for housing development for further consideration by the DAC Green Belt Study, including sites which already have planning permission?**

- 1.2.1. No. Before considering the constraints identified by the Council, it is necessary to highlight inconsistencies in the DAC Green Belt Study. Paragraph 2.3.6 identifies settlement status as a key factor in assessing Green Belt purposes a) and b), while paragraph 4.6.10 concludes that only Thundersley, South Benfleet, Hadleigh and Canvey Island are relevant large built-up areas. However, the Study does not provide a clear settlement hierarchy, defined settlement boundaries or methodology for classifying settlements. As villages should not be treated as large built-up areas, it is unclear why several sites associated with village settlements, including Daws Heath, are assessed as making a strong contribution to purposes a) and b). This lack of transparency calls into question the robustness of those conclusions.
- 1.2.2. Table 7 identifies sub-areas that perform strongly against Green Belt purpose a), while Table 8 assesses sub-areas against Green Belt purpose b). Table 12 and Figure 16 then identify potential Grey Belt sites by reference to the assessment of sub-parcels against those purposes.
- 1.2.3. For plan-making purposes, Annex 2 of the National Planning Policy Framework defines 'Grey Belt' as land that does not strongly contribute to Green Belt purposes a), b) or d) in paragraph 143 of the NPPF.
- 1.2.4. Figure 15 of the DAC Green Belt Study records the conclusion for each sub-area and indicates whether it is recommended for further consideration, recommended in part, or not recommended. However, the appendices do not clearly explain why only certain sub-areas are identified in part. For example, GB13 is recommended in part without a clear explanation, while GB11 is not, despite a live appeal relating to part of that sub-area.
- 1.2.5. Table 12 of the DAC Green Belt Study identifies potential Grey Belt sites. However, some parcels, including GB13, are assessed as strongly contributing to Green Belt purposes a) and b) when considered as a whole. Although Table 12 suggests that smaller areas within sub-areas may warrant further consideration, this approach does not appear to have been applied consistently. While paragraph 2.3.4 refers to paragraph 004 of the PPG, it remains unclear how, or whether, that methodology has been applied consistently.

- 1.2.6. In addition, paragraph 2.7.8 of the DAC Green Belt Study states that the strategic role and importance of the 'Daws Heath Ring' may need to be revisited in light of updated PPG clarification on the distinction between towns, villages and large built-up areas when applying purposes a) and b). This does not appear to have been addressed in the assessment.
- 1.2.7. Turning to the constraints identified by the Council, these do not adequately justify excluding all sites from further consideration for housing development through the DAC Green Belt Study, including sites subject to planning applications or planning permission. Despite the acute housing need in Castle Point, the Council appears to have dismissed all potential sites on sustainability grounds. Paragraph 5.6.4 states that "*None of the sub-areas identified as potential Grey Belt in Table 12...are subject to any footnote 7 constraints*". However, several sub-areas not identified as potential Grey Belt in Table 12, including GB11, are also not subject to footnote 7 constraints. No assessment has been undertaken of whether development harm could be outweighed by benefits or mitigated through technical work or developer contributions.
- 1.2.8. As set out in WSP's representations to the Regulation 19 Consultation, paragraphs 6.54 and 6.55 of the Regulation 19 Draft Local Plan state that the road network and health services are at capacity and that the Authority cannot accommodate growth in these areas. However, additional housing development is more likely to support infrastructure delivery than constrain it. For example, sub-areas such as GB11 were identified in the Green Belt Site Assessment (July 2025) as being capable in principle of development in highways terms, in accordance with the NPPF, and well located for access to existing services. They also have significant potential for modal shift if the proposed Initial Schedule of Interventions measures are implemented, including improved cycle infrastructure along Daws Heath Road and improved pedestrian crossings. In addition, Section 106 and Community Infrastructure Levy contributions from additional housing could help deliver essential infrastructure and support the Borough's affordable housing requirements.
- 1.2.9. As noted in the Regulation 19 representations, the Council recognised in the withdrawn 2016 and 2019 plans, and in the Regulation 18 Draft Local Plan, that significant Green Belt release was required to meet housing needs. Paragraph 147 of the NPPF (2024) requires local authorities, when reviewing Green Belt boundaries, to demonstrate the need for development and to prioritise previously developed land and Grey Belt. Castle Point should therefore take these matters into account to ensure compliance with the NPPF (2024).
- 1.2.10. Turning to housing need, Table 1 of the Housing Topic Paper (July 2025) states that Castle Point has delivered an average of approximately 99 dwellings per annum since 2015. By contrast, the standard method identifies a requirement of 686 dwellings per annum, meaning that only around 14% of the required homes are currently being delivered each year. The Plan target of 6,196 homes over the plan period also falls significantly short of the standard method figure of over 11,600 homes.
- 1.2.11. Modifications are therefore required to address unmet need in a clear, robust and deliverable way. As set out in WSP's Regulation 19 representation, the current approach to housing delivery is unsound and conflicts with NPPF paragraph 35, which requires plans to be positively prepared, justified, effective and consistent with national policy. The Plan does not meet those criteria because it fails, as a minimum, to meet Castle Point's objectively assessed housing needs through allocations over the plan period.

1.2.12. In our view, fundamental changes to the Plan are required, including the allocation of additional sites to meet the standard method requirement. Any additional allocations should not be limited to the sites identified in the DAC Green Belt Study, as those sites alone will not meet housing needs in full. Further sites are therefore required, and exceptional circumstances exist to justify amending Green Belt boundaries.

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?

1.2.13. The evidence base does not clearly demonstrate whether this issue has been considered. The DAC Green Belt Study does not assess it directly, stating at paragraph 5.7.4 that: *"it is considered that this assessment of the potential to 'fundamentally undermine' is a test that should be applied most appropriately at plan level rather than within the assessment of individual sub-areas..."* This matter is also not addressed in the Sustainability Appraisal, the Amendments to the Green Belt Boundary Topic Paper, or the Housing Capacity Topic Paper.

1.2.14. Similarly, although paragraph 2.7.8 of the DAC Green Belt Study states that the Daws Heath Ring may need to be revisited in light of updated PPG clarifications, this does not appear to have been taken forward.

1.2.15. The Council has therefore not provided clear evidence explaining where or how this issue has been considered. This should be addressed at the hearings.

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