

Hearing Statement – Matter 1: Housing Requirement and Provision

Castle Point Local Plan 2026–2043 Examination

On behalf of Persimmon Homes Ltd.

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Contents.

1. Introduction.....	3
2. Matter 1: Housing Requirement and Provision.....	3
Point a)	4
Point b)	6
3. Conclusion.....	7

1. Introduction

- 1.1. This Hearing Statement has been prepared by Pegasus Group on behalf of Persimmon Homes which has various land interests in Castle Point which are being promoted for residential-led development, as listed below:
- Land West of Benfleet (GB5)¹
 - Land East of Canvey Road, Canvey Island (GB2)
 - Land at The Chase, Thundersley (GB12)
- 1.2. The Inspectors issued an initial note on the 26th of March 2026 documenting their significant concerns about the soundness of the Castle Point Plan ('the Plan') in respect of housing requirement and supply. This is due to the Council only being able to provide approximately 52% (6,196) of its identified housing need (11,662) using the standard method.
- 1.3. Accordingly, through Matter 1 the Inspectors are examining whether the proposed housing requirement of 6,196 dwellings is justified and sound, and whether additional housing sites could appropriately be allocated in order to meet all or a greater proportion of the Borough's objectively assessed housing need.
- 1.4. This Statement sets out Persimmon's response to Matter 1 and should be read alongside Persimmon's Regulation 19 Representations. Given the limited scope of the current hearing sessions, Persimmon reserves the right to make further submissions on site-specific matters and other issues arising from the Examination, including the detailed conclusions of the Green Belt Assessment, Housing Capacity Topic Paper and other evidence base documents, as and when those matters are considered by the Inspectors.

2. Matter 1: Housing Requirement and Provision

- 2.1. The latest monitoring report (10.17)² confirms that Castle Point has '*struggled to deliver close to previous targets over the past two decades.*' This highlights the importance of the Plan to provide much needed homes for current housing needs, but also those generated by past periods of under-delivery and the resulting backlog of unmet housing need.
- 2.2. Persimmon's Regulation 19 Representations highlights issues with the stepped housing delivery. SP3(4) indicates that even the reduced housing requirement (6,196 dwellings) will only be met on an annual basis in the final seven years of the Plan period, with only 209 homes per annum allocated for delivery in the first five years, and 253 homes per annum in years 6-10. Meaning at the point of adoption, the Council would already be unable to demonstrate a five-year housing supply.

¹ A planning application was submitted in July 2026, with the reference 26/O310/OUT.

² Castle Point Borough Council Authority Monitoring Report and Infrastructure Funding Statement (1 April 2024 – 31 March 2025).

- 2.3. Furthermore, whilst the Council relies upon the existence of significant constraints to justify reducing the housing requirement from the Standard Method requirement of 11,662 dwellings to 6,196 dwellings, Persimmon is concerned that the evidence base does not clearly demonstrate that even this reduced requirement will be delivered. The proposed trajectory delays substantial levels of housing delivery until the latter years of the plan period and the Council's own monitoring evidence confirms a longstanding history of under-delivery.
- 2.4. In these circumstances, serious questions arise as to whether the proposed housing requirement is justified, effective, and capable of being delivered over the plan period. The Council's evidence demonstrates both that housing needs cannot be met in full without further consideration of Green Belt land and that there remains uncertainty over whether even the reduced requirement of 6,196 dwellings can be delivered through the proposed strategy. This is evidenced by the stepped trajectory, the absence of a detailed delivery programme, unresolved questions regarding the deliverability of key allocations and the reliance upon ambitious windfall assumptions. These concerns are set out in detail at paragraphs 2.23–2.34 of Persimmon's Regulation 19 Representations and remain unresolved through the submitted evidence base.
- 2.5. Persimmon shares the Inspectors' concerns regarding whether the Plan's proposed housing requirement of 6,196 dwellings is positively prepared, justified and consistent with national policy. The Council's evidence demonstrates that the principal reason for the substantial shortfall against identified housing needs is the extent of Green Belt designation across the Borough and the decision not to allocate additional Green Belt sites. Accordingly, the key issue raised by Matter 1 is whether the Council has demonstrated that the adverse impacts of providing for all or more of the Borough's objectively assessed housing needs would significantly and demonstrably outweigh the benefits when assessed against the policies of the NPPF taken as a whole. In Persimmon's view, that assessment depends largely upon whether the Council has robustly justified the exclusion of sites identified for further consideration through the Green Belt Assessment and whether there is clear evidence that further Green Belt release would fundamentally undermine the purposes of the remaining Green Belt across the Borough. For the reasons set out below, Persimmon considers that the evidence base does not substantiate such a conclusion.

Point a)

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?

- 2.6. No. Persimmon's Regulation 19 Representations challenges the soundness of the evidence base in detail. In considering this evidence base, the Plan disregards much of the evidence which identifies areas of Green Belt that should have been considered in more detail (in the Green Belt Assessment (7.02, July 2025)). Furthermore, the evidence base does not substantiate a conclusion that the harms arising from additional housing provision would significantly and demonstrably outweigh the benefits, as required by paragraph 11(b) of the NPPF. In particular, it fails to demonstrate that the benefits associated with delivering additional homes, including those recognised within the Equality Impact Assessment (1.21, July 2025), have been properly weighed in the planning balance.

- 2.7. The Council's own Green Belt Assessment identified GB2, GB5, GB12 and a number of other parcels as suitable for further consideration through the plan-making process. However, the evidence base does not adequately explain why those sites were ultimately discounted, particularly in light of the substantial housing shortfall and the NPPF requirement to review Green Belt boundaries where development needs cannot otherwise be met. Whilst the Council relies upon a combination of strategic and site-specific constraints, it has not clearly demonstrated why those constraints justify the exclusion of the sites identified for further consideration, nor provided clear evidence that their release would fundamentally undermine the purposes of the remaining Green Belt across the Borough. This issue is considered further below in respect of each of the Council's stated constraints.

Constraint 1: Potential Green Belt destruction, undermining Policy SP1, Wellbeing and Heritage Assets (para. 6.53 of the Plan)

- 2.8. As confirmed in the Council's response to technical questions³, the Green Belt covers 55.9% of the land in the district. However, not all areas of Green Belt are equal. The NPPF recognises this by providing routes to develop Green Belt, especially through paragraphs 67, 144, 148, 151 and 154– 156. Paragraph 14.3 of the Housing Capacity Topic Paper confirms that 12 Green Belt sites, together with parts of a further 5 sites, should continue to be considered through the plan-making process. Despite this identified capacity, the Plan does not adequately explain why these opportunities have not been pursued in order to increase housing provision beyond 6,196 dwellings. Given the Council's own evidence identifies additional Green Belt capacity worthy of further consideration, the Plan does not demonstrate why opportunities to increase housing provision beyond 6,196 dwellings have been discounted. In this respect, it has not been positively prepared, justified or consistent with the NPPF.
- 2.9. As detailed at paragraphs 2.6–2.8 of Persimmon's Regulation 19 Representation, the evidence base does not demonstrate that environmental, biodiversity or heritage constraints justify the exclusion of the sites identified for further consideration through the Green Belt Assessment. In particular, there is no comprehensive evidence demonstrating that such sites would give rise to impacts which could not be avoided, mitigated or appropriately managed through the development process.

Constraint 2: Road Network Capacity and Sustainability / Accessibility (para. 6.54)

- 2.10. Persimmon's Regulation 19 Representations identifies a number of significant concerns regarding the robustness of the Council's transport evidence, including the assumptions used to assess Green Belt sites, sustainable transport accessibility and reliance on the Essex Parking Guidance Connectivity Map. These matters are addressed in detail at paragraphs 2.9–2.15 of the Representation and collectively cast doubt on the Council's reliance on transport impacts as a reason for discounting Green Belt allocations.

Constraint 3: Health Service Provision (para. 6.55)

- 2.11. In relation to health service provision, the NPPF requires planning policies to take a proactive approach to supporting sustainable development and should be informed by infrastructure requirements. Whilst it is accepted that the issue is a challenge, the Council

³ Castle Point Borough Council Response to Technical Questions (1 July 2026)

again takes a pessimistic approach by concluding that health service provision constrains growth, rather than using growth as an opportunity to mitigate this constraint. This position is difficult to reconcile with the proposed allocation of Thundersley Clinic for housing under Policy Thun3A, notwithstanding the Plan's reliance on health infrastructure constraints as a justification for limiting housing growth. The issue identified by the Council boils down to NHS staffing resource, which should not be a barrier to delivering much needed housing. Indeed, the severe under provision of housing in the area over past decades will have only inflated health related issues in the area.

Constraint 4: Physical / Market Capacity (para. 6.56)

- 2.12. No evidence is put forward to support the argument that there is a risk of “overallocation” of housing in a constrained market area. Ultimately, developers would not be promoting sites for development if there was no market demand or capacity to build homes in the area, and they would certainly not incur the significant costs associated with preparing planning applications. As recognised in the Housing Capacity Topic Paper, house prices have increased significantly and developers continue to promote sites in the Borough, demonstrating clear demand for additional housing. The evidence base therefore does not demonstrate that market capacity provides a sound basis for restricting housing delivery to the level proposed.
- 2.13. Taken together, the issues identified above demonstrate that the Council has not robustly justified the exclusion of sites identified for further consideration through the Green Belt Assessment, nor demonstrated that the identified constraints cannot be addressed through mitigation, infrastructure provision or site design.
- 2.14. The Council's evidence demonstrates that Castle Point is unable to meet its objectively assessed housing need within the urban area. In these circumstances, exceptional circumstances clearly exist to justify consideration of Green Belt boundary alterations through the Local Plan process. The question is therefore not whether Green Belt release should be contemplated in principle, but whether the Council has robustly demonstrated that the sites identified for further consideration in the Green Belt Assessment should nevertheless be excluded from allocation. For the reasons set out above, the Council has not shown that the identified constraints, whether individually or collectively, justify the rejection of those sites, nor that any residual harms would significantly and demonstrably outweigh the substantial social, economic and affordability benefits arising from meeting a greater proportion of the Borough's housing needs. Accordingly, the constraints identified by the Council do not justify the exclusion of the sites recommended for further consideration and should not prevent exploration of Green Belt release through the Plan.

Point b)

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?

- 2.15. No. Paragraph 14.3 of the Housing Capacity Topic Paper confirms that 12 Green Belt sites, together with parts of a further 5 sites, are identified as being suitable for further consideration and could deliver approximately 3,792 additional homes. This capacity is derived from the Council's own Green Belt Assessment and associated evidence base and

therefore represents a level of development the Council has itself identified as worthy of further consideration. Furthermore, these figures are necessarily high-level and conservative – Persimmon reserves comment on the suitability, capacity and deliverability of individual sites to be examined in greater detail through subsequent hearing sessions. Despite this identified capacity, the Plan nor its evidence base does not adequately explain why these opportunities have not been taken forward in order to increase housing provision beyond the proposed requirement of 6,196 dwellings.

- 2.16. The evidence before the Examination does not provide a clear basis for concluding that alterations to Green Belt boundaries would fundamentally undermine the purposes of the remaining Green Belt across the Borough as a whole. This is a plan-level judgement which must consider the cumulative effect of releases across the wider Green Belt, rather than the performance of individual parcels in isolation. However, it is not clear from the evidence base where such an assessment has been undertaken, nor how the Council has concluded that accommodating a greater proportion of identified housing needs through selective Green Belt release would fundamentally undermine Green Belt purposes when considered across the plan area.
- 2.17. The Green Belt Assessment nevertheless provides a clear indication that at least some parcels identified for further consideration could be released without causing harm to the wider Green Belt. Taking Land West of Benfleet (GB5) as an example, the Green Belt Assessment confirms that the overall performance of this parcel against the Green Belt purposes is “Moderate” (i.e. the site is Grey Belt), and that if the parcel were to be released, *“that it would be unlikely to significantly harm the performance of the wider Green Belt owing to its limited size relative to the wider Green Belt and its position to the very west of the plan area”*.
- 2.18. Similar conclusions informed the recommendation that 12 sites, and parts of a further 5 sites, should continue to be considered through the plan-making process. In the absence of clear evidence demonstrating that the cumulative release of such sites would fundamentally undermine the purposes of the remaining Green Belt, there remains a strong basis for considering additional Green Belt releases in order to move closer towards meeting objectively assessed housing needs.

3. Conclusion

- 3.1. Persimmon agrees with the Inspectors' concerns regarding the soundness of the proposed housing requirement. The evidence base demonstrates both that identified housing needs cannot be met without further consideration of Green Belt land and that additional sites have been identified by the Council's own evidence as suitable for further consideration. Despite this, the Plan proposes to meet only approximately 52% of objectively assessed housing needs and does not adequately explain why opportunities to deliver a significantly greater level of housing growth have been discounted. As such, Persimmon considers that the Plan has not demonstrated that its proposed housing requirement or spatial strategy represents the most appropriate strategy when considered against the reasonable alternatives. Persimmon would also add that the evidence base does not provide sufficient certainty that even the reduced requirement of 6,196 dwellings can be delivered.
- 3.2. The Council's own evidence identifies a number of Green Belt sites that are suitable as a minimum for further consideration and capable of contributing meaningfully towards housing delivery. Collectively, these sites demonstrate that opportunities exist to increase

housing provision beyond the proposed requirement of 6,196 dwellings. However, the evidence base does not adequately explain why these opportunities have been discounted, nor does it demonstrate that the identified constraints justify their exclusion. The Plan therefore fails to demonstrate that the proposed housing requirement and spatial strategy represent the most appropriate approach when considered against the reasonable alternatives.

- 3.3. Furthermore, the Council has not provided clear evidence that increasing housing provision through additional Green Belt release would fundamentally undermine the purposes of the remaining Green Belt across the Borough, nor that the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies of the Framework taken as a whole. In Persimmon's view, the concerns raised by the Inspectors in Matter 1 are capable of being resolved through the allocation of additional sites, including those identified for further consideration within the Council's own evidence base. Such an approach would increase housing delivery and provide a more robust basis for concluding that the Plan is positively prepared, justified and consistent with national policy.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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