

Castle Point Plan

Initial Matters Issue and Questions: Hearing
Statement on behalf of The Salvation Army –

July 2026

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1. Introduction

- 1.1 This Hearing Statement has been prepared on behalf of our client The Salvation Army ('TSA'), in response to the Examination in Public of the submission version of Castle Point Plan 2026 – 2043 ('the Plan'). TSA submitted representations to the Regulation 19 consultation of the Plan.
- 1.2 The Examining inspectors have raised Initial Matters, Issue and Questions that will be the subject of examination hearing sessions in September 2026. The purpose of this Hearing Statement is to summarise the position of TSA on those Matters, Issues and Questions.
- 1.3 TSA is promoting 'Land at Hadleigh Farm, Hadleigh' (site reference GB8) for inclusion within the Plan. That land is not proposed for allocation in the Plan and so is an 'omission site'. As per the Initial Examination Guidance Note issued by the inspectors, this Hearing Statement does not seek to address matters relating to the merits, or otherwise, of this site, or any other promoted, or omission sites, for allocation in the Plan. Should the examination of the Plan proceed beyond September, TSA will request attendance at relevant future hearing sessions on these matters. That said, in order to respond directly to the questions raised by the inspectors, it is necessary to refer briefly to how the site has been assessed by documents in the Council's evidence base.
- 1.4 This Hearing Statement only responds directly to the Matter and Questions raised by the inspectors in their note of 17th June 2026.

2. Matter 1 (Housing requirement and provision)

- 2.1 The inspectors have identified ‘significant concerns’ as to the soundness of the Plan, particularly with regard to ‘whether or not more housing sites could appropriately be allocated in order to meet all or more of the area’s objectively assessed housing need’. That concern is in the context of the Plan promoting land for 6,196 homes, against a need figure of 11,662 (i.e. 52% of need with reference to the standard method figure).
- 2.2 This is a concern that we share, as summarised in the Regulation 19 representations submitted on behalf of TSA. It is our opinion that the approach to housing supply vs need being advanced is seriously flawed and the Plan is unsound.
- 2.3 As both a significant landowner and a charitable organisation working with vulnerable individuals across Castle Point, The Salvation Army has a particular interest in ensuring that the planning system supports the delivery of sufficient, sustainable and inclusive housing opportunities.

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?

- 2.4 Chapter 6 of the Plan is called ‘Castle Point’s Strategic Policies and Approach’. It describes the overall strategy for the Plan and paragraph 6.1 says that:

The overriding objective of the Plan is to protect and enhance the open spaces, habitats, historic and natural landscape and character of the Borough for the enjoyment of all its residents, visitors, workers and wildlife.

- 2.5 The use of the word ‘overriding’ is telling and important in the context of understanding the extent to which the Plan is positively prepared, justified and consistent with national policy. It demonstrates that the Plan is founded on a strategy which is biased against meeting the need for development in favour of protecting open spaces etc. This approach is inherently inconsistent with the Framework, which, where appropriate tells plan and decision makers how to approach the application of weight. There is nothing in the Framework to say that overriding weight can be given to these objectives in plan making.
- 2.6 The strategy does not seek to meet the area’s objectively assessed need for new homes. Instead, it, attaches ‘overriding’ importance to factors with the potential to impede the delivery of housing. This approach is not based on their being an evidence based ‘need’ to retain, for example, all open spaces in Castle Point.
- 2.7 Paragraph 6.2 of the Plan describes that ‘there is a strong local desire to protect green and open spaces’. It is quite understandable that, as in very many local communities, there is a desire to protect green spaces, but that is not the same thing as there being an objectively assessed need to protect all open spaces, which is the Framework test at paragraph 36a).
- 2.8 Conversely, there is a clear objectively assessed need for 11,662 new homes in Castle Point over the Plan period. The Plan clearly does not meet that need, but nor does it seek to. On the contrary, it seeks to restrict the delivery of homes by placing ‘overriding’ importance on other factors, even where there is not an objectively assessed need to do so.

- 2.9 For The Salvation Army, housing need is not solely a statistical exercise. Behind the significant shortfall in housing provision are individuals and families facing affordability pressures, overcrowding, insecure housing circumstances and barriers to accessing homes that meet their needs. Ensuring sufficient housing provision is therefore both a planning and social objective.
- 2.10 The Plan is plainly not positively prepared, justified or consistent with the Framework. This is not a surprise because its overall strategy is flawed and inconsistent with the Framework's requirements for plan making.
- 2.11 The Council has not, as far as we are aware, undertaken an assessment of whether meeting objectively assessed housing need would significantly and demonstrably outweigh the benefits of doing so, when assessed against the policies of the Framework as a whole. Given the very substantial benefits associated with the delivery of enough housing in an area that has performed so poorly at doing, the weight to be attached to meeting housing need would, in our view, attach the very highest order of weight in such a balancing exercise.

Question 1a: 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?

- 2.12 The DAC Green Belt Study concludes that 12 'subareas' and parts of 5 further 'subareas' are 'recommended for further consideration' by the Council when determining what land to allocate for development. We do not pass comment on the extent to which the Council's justification for then not allocating those sites is robust or not.
- 2.13 We would, however, note that were the Council to change its position on all of those 17 (12 +5) 'subareas' so as to allocate the land within them that is being promoted, the Plan would continue to fall substantially short of meeting housing need in Castle Point. Assuming that potential future, and existing allocations and windfall allowances were all found to be sound, the housing supply figure would still be 1,664 homes below the standard method figure. It might be easy to overlook the seriousness of that potential future undersupply in the context of what is an extremely low starting position of the current Plan.
- 2.14 The DAC 'further consideration' sites are therefore, in our view, not the end of the story on this matter. Instead, the Council's approach to the assessment of Green Belt sites against the necessary tests should be revisited and robustly tested.
- 2.15 We have described in our Regulation 19 representations how the DAC Study has erred in its assessment of Green Belt sites against 'Grey Belt' criteria. For example, the sole reason for concluding that GB8 is not 'Grey Belt' is because it strongly contributes towards criteria b) (to prevent neighbouring towns merging into one another). That is despite the fact that the two towns in question have already long since merged and so the site cannot make any contribution towards that purpose, let alone a 'strong one'.
- 2.16 We would, therefore, strongly advocate for a scenario whereby, whatever format the Council's local planning process continues, there is a comprehensive revisiting of the Council's approach to allocating land outside of settlements through an updated, and corrected Green Belt Study.
- 2.17 On the basis that a corrected Study would reach a conclusion that GB8 should be regarded as 'Grey Belt', discussion would then turn to other justifications advanced by the Council for not allocating the land. These are perceived landscape and heritage impacts.
- 2.18 Our Regulation 19 representations describe how any assessments by the Council on these matters did not have the benefit of detailed technical reports on them, and an illustrative masterplan that has been prepared in the context of this

technical advice. Now that the Council has had sight of these, we would anticipate that different conclusions would be made on the overall suitability of the site for development. We would also encourage the Council to fully consider the various benefits associated with the delivery of this site including enhancing community resilience and service provision to the most vulnerable in the Castle Point community.

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?

2.19 No, the Council has not undertaken this exercise because of the way in which it has approached the matter of Green Belt release for development.

3. Conclusions

- 3.1 For these reasons, we agree with the concerns expressed by the inspectors as to the soundness of the Plan in its current form.



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