

CASTLE POINT BOROUGH COUNCIL LOCAL PLAN EXAMINATION – HEARING STATEMENT

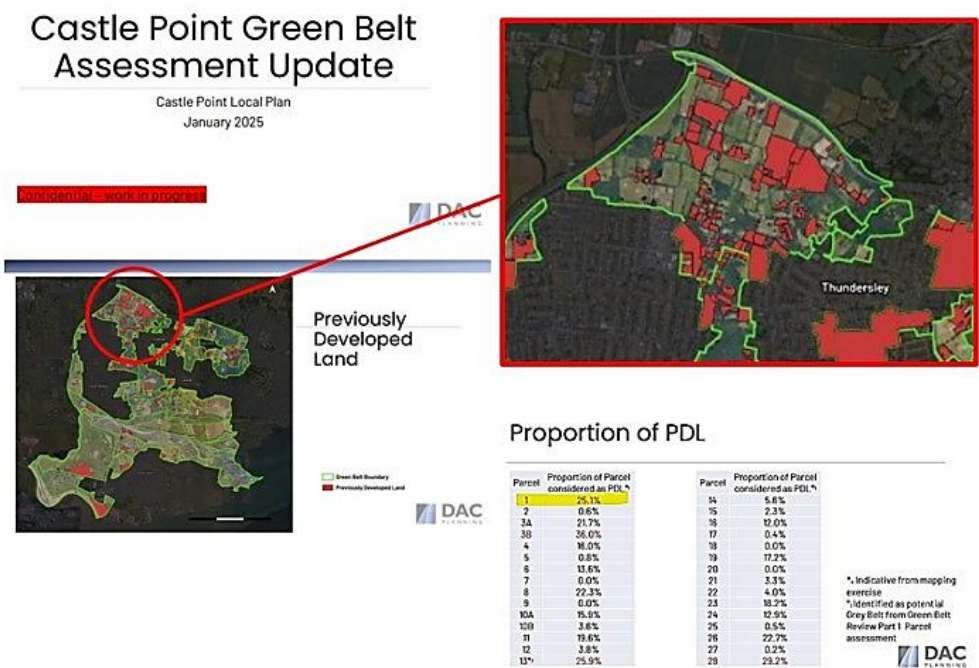
Statement from Martin England, Hadleigh Resident and Head of the Save Hadleigh Farmland Group

My personal response on the council website, number 1025 is detailed and thorough which represents my complete views on this local plan.

I wish to make the following comments on the various questions, based on my previous submission and also on events and information that has been made known and revealed after submissions were made for the Reg 19 Consultation in September 2025, which I declared the local plan unsound.

This Statement has been prepared specifically in response to Matter 1: The housing requirement and site selection process.

1. It is clear that insufficient housing has been identified to meet the standard housing requirement with 53% of the 11,662 target. Castle Point current planning statistics have identified one of the lowest five year land supply in the UK at 0.58 years, the lowest HDT in the UK at 14% and the third oldest local plan in the UK at 28 years, which questions the soundness of the local plan.
2. The local plan site selection ignores Greenbelt / Grey Belt against new NPPF guidelines, is not consistent with national policy and fails to identify reasonable alternatives to address the unmet housing need. With regards to the site selection process, the site criteria used lacks robustness due to predetermination, narrowness, selective omissions and lack of clarity, that's biased towards a no greenbelt build policy. This questions the soundness of the local plan, but was the local plan predetermined.
3. The local plan is based on the over development of Brownfield sites, with a Brownfield only selection process, so there are still questions of whether the selection criteria was applied correctly to all viable sites and therefore is unsound. Not all sites have been considered seriously and this includes the exclusion of North West Thundersley which undermines any claims the process has been thorough.
4. The issue mainly is questioning of why North West Thundersley was excluded from consideration. I refer to the DAC Planning Green Belt Assessment for Castle Point Borough Council July 2025 document 7.02, see page 67, Potential Grey Belt (based on sub-area assessments and factoring PDL in the Green Belt). We have identified a potential Grey Belt site, with 25% PDL, at approx.47 Hectares, and approx. 50% on the call for sites, but now does not have one home allocated. You will not find the 25% PDL (Grey Belt) in any evidence documents, which was obtained through an FOI, see below.



It was contained in a confidential initial document as the direction for this Green Belt Assessment report, but was never published, and NWT conveniently disappeared between P16 and P18, but remains as Grey Belt on the map. Why has this document been hidden from the evidence documents and it undermines any claims the process for NWT has been thorough.

5. This independent DAC Planning Grey Belt document states the North West Thundersley site is not viable, but emails show DAC Planning were told by officers from the council, "can we included the text about not considering GB16 North West Thundersley", see below.

From: [REDACTED]@castlepoint.gov.uk
Sent: 23 July 2025 16:23
To: [REDACTED]@dacplanning.com; [REDACTED]@castlepoint.gov.uk
Cc: [REDACTED]@dacplanning.com
Subject: Re: Green Belt Assessment Draft Report

Hi [REDACTED]

Thanks to you and all the team on pulling this together. Overall it is a very well written and well presented report.

Some comments below:

- After figure 1 is it possible to include a map that shows the CP Green Belt in the context of the wider Green Belt to which it connects

Is it worth referring to Figure 8 here too? (similar to how para 5.2.1 is set out).

- Para 4.6.10 - Clarify whether Brook Farm decision has been one of the appeal decisions considered in reaching this conclusion.
- Para 5.1.2 - can we include the text about not considering GB16 North West Thundersley (essentially Parcel 1) here, I think there was some wording in the previous April 2025 version of the report?
- Table 6 is a bit confusing as it can be read that each row is a single entry and causes confusion because GB1 is not in Daws Heath, as an example. Can this table be presented as one site per row please.

Many Thanks



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DAC Planning also told the council that they need to add a further note to pre-empt any accusations that "when published it could lead to (unfair) accusations that the Council has pre-judged the outcome of our work", confirming "it has been very iterative" process, see below.

From: [REDACTED]@dacplanning.com
Sent: 29 July 2025 11:26
To: [REDACTED]@castlepoint.gov.uk
Cc: [REDACTED]@dacplanning.com; [REDACTED]@castlepoint.gov.uk; [REDACTED]@dacplanning.com
Subject: RE: Green Belt Assessment Draft Report

[REDACTED]

Further to the below, I also propose to insert the following at the start of our report. I'm conscious that our report will be dated July 2025 when published which could lead to (unfair) accusations that the Council has pre-judged the outcome of our work before agreeing the approach of the Reg 19 Local Plan when in reality we have reported back to you to inform plan-making throughout the process.

DAC Planning was commissioned by the Council to undertake a Green Belt Assessment in September 2024 to inform the emerging Castle Point Plan. The assessment has been produced to supplement and update the Council's existing Green Belt evidence base. Throughout the course of the commission DAC Planning has worked iteratively with the Council to produce the Green Belt Assessment to inform the plan-making process whilst responding constructively to changes which have occurred to national planning policy and guidance in respect of Green Belt. Yes please, this makes a lot of sense and is true. It has been very iterative!

I trust that this is helpful but please let me know if you have any comments.

Thanks

[REDACTED]

I refer to the DAC Planning Green Belt Assessment for Castle Point Borough Council July 2025 document 7.02, see points 1.1.2 & 5.1.2, and this email data was obtained through an FOI, see Appendix B. The site selection process had a clear agenda that no development should take place within North West Thundersley.

6. The site selection process excludes the smaller Greenbelt sites, so not all sites have been considered. This questions the validity of the 100 home minimum threshold for Greenbelt sites. This decision was documented at a local plan board meeting, reference CP Plan Board Notes 3 April 2024, but there is no evidence to justify that decision. Sites on the old SHLAA 2018 and previously found sound local plan have been totally ignored, with the same officers that thought they were acceptable previously, now concur their exclusion. This 100 home minimum issue was also highlighted in Advisory Visit notes, and I refer you to Castle Point Plan Advisory Visit 27th February 2025, document 13.02. The question is raised that the site selection process has clearly been affected by the limitation and what was the motivation.

7. There is a lack of evidence that our area cannot meet the high housing target, and the gap has not been robustly justified. The council housing need requirement was set a target for our council throughout the Reg 18 consultation. This has been their prime argument for any shortfall in the housing target, so why did the housing target change between May 2025 and July 2025 for the Reg 19 Consultation, from 5100 to 6196 homes. There is evidence that the housing need target of 350 homes per annum is not correct and should be nearer 550 homes per annum, including potential households that will require affordable housing, which puts our real housing target around 8-9000 homes. I refer to the Local Housing Needs Assessment Update - June 2025, document 10.02, see points 4.18, 4.46, 4.50, 4.65, and 4.69. This shows the local plan does not allow for any future potential households, especially young people under the age of 30, forcing households to leave the area.

8. I may also question why our housing target is 6,196 homes, and we have a shortfall, but within the evidence documents we have Grey Belt designation and a Plan B for 9998 homes. I refer to the Castle Point Housing Capacity Topic Paper August 2025, document 7.09, see pages 44-46 Green Belt Review Map, Potential Grey Belt, see paragraph 14.3, which states 9998 homes. This is backed up by the IDP Addendum, which shows a housing target of 9848 homes. I refer to the Infrastructure Delivery Plan Addendum December 2025, document 9.42, see page 7. This questions the true housing target within our own local plan documents.

9. I am concerned that the Grey Belt designation has been determined but is unchallenged. Many of the published Greenbelt assessments state these sites are Greenbelt, so the methodology used raises question as to what information was used to score the various sites. I refer to the DAC Planning Green Belt Assessment for Castle Point Borough Council July 2025, document 7.02, point 5.4.4, which states overall, 12 sub-areas are recommended for further consideration by the Council and five other areas a reduced area is recommended to the Council for further consideration. Interesting North West Thundersley, our largest potential Grey Belt site is not included, or seriously considered. The analysis is inconsistent, which shows poor knowledge and understanding of the site and surroundings being reviewed from desk based assessment of the sites, and these arbitrary tests are not supported by national policy. Some of these precious Greenbelt sites have clearly been mislabelled, and should not be treated as Grey Belt, with each making a clear and demonstrable contribution to the Green Belt purposes as set out in the NPPF. The Council's classification of these sites as Grey Belt is unjustified and dangerous. NWT is identified a potential Grey Belt site, with 25% PDL, at 47 Hectares, and approx. 50% on the call for sites, but now does not have one home allocated. This failure to consider North West Thundersley site seriously shows it should be added as an alternative.

10. I need to raise questions about the Statement of Common Ground between CPBC and ECC. I refer to the Statement of Common Ground - CPBC and ECC - North West Thundersley document 12.01, dated August 2025. This document does not mention PDL at 25% of the site. Our group started to submit responses in August 2025, give out public advice to our members about North West Thundersley as an alternative, so this individual document conveniently appeared to justify the councillor decision to exclude it. On social media, councillors pushed the North West Thundersley is 100% Greenbelt narrative, which was misinformation. It also raises questions that this document was signed by ECC, dated 12th September 2025, six weeks after the consultation started, so why was this evidence withheld.

11. Within this Statement of Common Ground document, point 6.7, it links to the Essex County Council's Development Management Policies. The ECC Policy DM1 clearly states all proposals are assessed and determined in relation to the Development Management Route Hierarchy Policies, where vehicular access is accepted in principle, the number of access points will be kept to a minimum and new access points will be designed and constructed in accordance with the current standards, where existing access is to be used substandard accesses will be improved and/or upgraded in accordance with the current standards for the category of road, and all proposals are assessed and determined against current standards for the category of road having regard to the capacity, safety and geometry of the highway network. This ECC document, in the SoCG, clearly shows ECC evaluate proposals, but there is no proposal or vision submitted, and ECC have had no plan to review over the NWT. The Council have made no attempt to work positively with developers and landowners, neighbouring authorities, ECC, and infrastructure providers throughout the planning process to consider the viability of NWT. The IDP document fails to address the infrastructure needs to meet the growth within the Borough, with a development on the scale of NWT. This failure to consider North West Thundersley site seriously shows it should be added as an alternative.

12. The council continue to categorically state that access from the A130 is not viable, and Essex County Council refuse to permit an access to the A130 but past plans show a scheme was positively discussed by CPBC, ECC and Basildon Council many years ago, but this has been ignored, plan shown in my response 1025. This scheme shows what can be achieved with dialogue, the intention to progress positively and working in partnership. There were two NWT Dove Reports, dated 2016, published on the Council's own website, with the maps and plans for North West Thundersley, but they have now been removed from the website recently, making the removal of evidence worse than the lack of evidence. This scheme was deemed unviable because of the cost of the project for around 400-1000 homes, to offset infrastructure highways costs. This failure to consider North West Thundersley site seriously shows it should be added as an alternative.

13. There are issues that the Reg 19 Local Plan Consultation document, published in July 2025 that did not comply with the IDP document issued in May 2025. I refer you to the Infrastructure Delivery Plan (IDP) - May 2025, document 9.02, which as an example, the IPD document states 1000 homes max for Canvey West, but two months later that has been increased to 2700 homes on the Reg 19 consultation, and 80 homes for Scrub Lane, but two months later that has been increased to 114 homes, without any evidence provided. The local plan board notes around this time do not show details of these increase in the housing numbers. The IDP was out of date at the time of the consultation and the Addendum wasn't published until December 2025, with revised targets. The increase in the Housing Target was never resident led, but who made these decisions, and where is the justification.

14. The local plan is based on the total over development of urban sites policy across the borough, especially on Canvey, which was not resident led, and the allocation of 3316 homes for Canvey is unjustified. This figure, if you then include half the existing commitments and windfall allowance would increase by 578 to 3894 homes, which is 63% of the current 6196 housing target. I refer you to the Castle Point Plan - Issues and Options Consultation - Published Responses, document 3.04. Within the Reg 18 published responses, of the 909 responses only 38 mentioned Charfleets. We believe that public consultation has not been adequate in explaining the true impact of the plan to enough people and gaining input into the plan. No one was aware of the implications of the Reg 18 consultation, so it is definitely not resident led, and is basically the local plan boards interpretation of resident responses, to suit a no building on the Greenbelt policy. If Canvey is to be allocated approx. 4000 homes, then a Third Road for Canvey is a priority, with infrastructure first. It's interesting that they can propose nearly 4000 homes on Canvey with no improved road access, but they can't proposed 4000 homes on NWT because the road access needs to be improved.

15. We have discussed the implications of the local plan not being resident led, and I refer you to the Regulation 19 Individual Representations, document 1.04. Within the local plan Reg 19 published responses, of the 1448 Reg 19 responses North West Thundersley was mentioned 2228 times. This shows the feeling of strength from residents for consideration of the NWT site, but has been ignored. This failure to consider North West Thundersley site seriously shows it should be added as an alternative.

16. With regards to the Housing Target, as stated, it suddenly increased around May 2025, without public knowledge, resulting in a new 6196 target in the Reg 19 Consultation published two months later in July 2025. The 5100 target was always set and confirmed in local plan board notes, reference CP Plan Board Notes 11 Sep 2024. Our council talk about keeping to the housing need figure of 5100 homes, but increased that figure around May 2025 to 6196 homes going against their own methodology. I refer you to the Castle Point Plan Advisory Visit 27th February 2025, document 13.02. After the advisory visit on 27th February 2025, the notes clearly show an uplift to the housing target was required. I refer you to the Infrastructure Delivery Plan (IDP) - May 2025, document 9.02, dated May 2025 which confirms this, as it states 1000 homes for Canvey West which increased to 2700 homes, 80 homes for Scrub Lane increased to 114 homes, 100 homes for Land at the Point Canvey increased to 185 homes and 74 homes for Hadleigh Island increased to 94 homes, all by July 2025. These housings increases had no justification, no detail why, no minutes or notes recorded or published, and I believe were a panic after the advisory visit warning in February 2025, to increase the housing target, without any evidence provided.

17. I would also bring to your attention the inspectorate Advisory visit on 27th February 2025 and the published notes, reference Castle Point Plan Advisory Visit 27th February 2025, document 13.02. On the Castle Point Plan Latest News Website, dated 11th May 2026, minutes from the Advisory visits held on 25th July 2024 and 27th February 2025 with the Planning Inspectorate were added to the Post Submission documents in the Examination Library. These minutes show discussions with the planning inspectorate where the Council were warned about low housing targets, are yet to quantify what level of housing need the plan will accommodate, a lack of evidence, out of date LDS timetable, a five year housing land supply of 0.4 years, evidence base is lacking, council should be more pro-active, and the key points raise significant questions regarding the timetable identified within the LDS, which we now know submission was delayed from April 2025 to January 2026. It also mentioned the need for the Council to revisit the Green Belt sites which were excluded with the over 100 units limitation and more importantly the Council will need to consider carefully whether it is a good use of public time and expense to submit the Plan in its current form. The Advisory visit for February 2025 was recorded in the Local Plan Board notes, reference CP Plan Board Notes - 9 April 2025, with little detail, and only states "this identified the need for additional work which is underway", which is an understatement and not a full disclosure. This condemnation from the planning inspectorate, with the failure to quantify what level of housing need the plan will accommodate, means more houses were added to the local plan from 5100 to 6196, resulting in 3300 homes on Canvey. This is why the IDP was updated with an addendum to increase the housing numbers, some ten months later. These increases had no justification, no detail why, no minutes or notes recorded, and were increased without any evidence provided. These are minutes, from a meeting fourteen months ago, that were hidden and the publication of this evidence document delayed. If this document was published prior to the Reg 19 consultation residents would have been more informed about the process, and the issues raised from government advisors, so shows a lack of transparency, yet went ahead with the consultation and submitted their local plan, at tax payers expense. This secret document hidden from the public would definitely have affected the outcome of the public responses.

18. Our local plan is based on 100% Brownfield only sites, but within the evidence documents, to date, there is no Brownfield Land Register, so why is this missing. This document was updated at a cabinet meeting, dated 15th July 2026, where it was updated to 58 Brownfield sites, although a miscount they stated 59 sites. The council website for this information is out of date, and at the Reg 18 consultation it only contained 47 sites, with reduced housing numbers. This latest update has six missing Brownfield sites from the submitted local plan, Had4 Scrub Lane, B7B Tarmarisk Villa Park, C10B Land Rear of North Ave, C10E Corner of Little Gypps Road and Willow Close, C10F Ozonia Gardens, and C10G Land between Station Road and Seaview Road. There are 24 Brownfield sites listed on the register that are not on the local plan, which are major sites, Park Chase Hadleigh, High St Benfleet, Brier Cottage Canvey, and Halfords Thundersley. This information should be updated but these sites add numbers to our local plan but are missing, and these should have been identified.

19. Since our Save Hadleigh Farmland groups initial responses in September 2025, we have shown the local plan is not resident led. The published responses from the Reg 19 Consultation are quite revealing, with around 73% of the 1448 responses calling the local plan unsound. Our neighbours and Leigh residents are part of the objections, although from the next borough this local plan affects them, especially the Salvation Army site with urban sprawl and highways issues. Southend Council have

strongly objected, Nr 0354 and Leigh Town Council, Nr 0275, all highlighting the objection to building on the Salvation Army Farmland. Both MP's for Castle Point and Southend & Leigh West have strongly objected to the local plan and development on the Hadleigh Farmland site. Five other surrounding councils have called the local plan unsound, and even within the Borough of Castle Point, where Canvey Island Town Council, number 0331, called the local plan unsound. Canvey Island Town Council has three Councillors, who are also Borough Councillors, which is somewhat embarrassing, especially as one is the council leader and is on the local plan board, so I am not quite sure how that actually works. Canvey Island Town Council stated, the plan does not take into consideration the views of residents, it overdevelops an existing heavily urbanised area, it impacts the overall safety of the island, with two COMAH sites and no clear emergency plan this will further impede attempts to exit the island, Canvey Island is a flood zone 3a, the highest probability of flooding, and any need for evacuation in the event of an emergency or terrorist incident will become unsustainable. It's obvious the number of prominent responses are all saying the same thing about the local plan.

20. The council's main strategy for the local plan is no building on the Greenbelt. I refer you to the Amendments to Green Belt Boundaries Topic Paper - Jan 2026, document 7.10, which shows our Greenbelt boundaries. This map on page 5, shows the Greenbelt sites of North West Thundersley, Salvation Army Farmland, Daws Heath and the area around Essex Way. I refer you to a recent planning application 25/0574/FUL for Brooks Stables Hilltop Avenue. On the Amendments to Green Belt Boundaries Topic Paper, the map shows this site is clearly within the Greenbelt, but this council approved this Greenbelt development on 12th February 2026, for only three homes but it's on the Greenbelt. This council have lost four Greenbelt planning appeals in the last two years, with the largest site at Brook Farm, after calling Daws Heath a village, setting a precedent, but having a sound plan protects the remaining precious Greenbelt sites. Our councillors continue to state on social media that "if you release one piece of Greenbelt, you lose them all" so their defence is flawed and an opinion or ideology is not evidence, leading to predetermination.

21. The Landscape Sensitivity Assessment reports are not consistent and I'd question the evidence within the report. I refer you to the Landscape Sensitivity Assessment and Outline Landscape Appraisal - November 2024 - 1 of 3, document 7.04. It clearly states, on page 9, the following was recorded for each of the sites, Previously-developed or 'brownfield land', but there's no mention of PDL within the report. I refer you to the Landscape Sensitivity Assessment and Outline Landscape Appraisal - November 2024 - 2 of 3, document 7.05. I'd seriously question why GB8 has conveniently been split into two sites, GB8A East and GB8B West. There's no reason for this and similar sites GB4 Jotman's, GB12 The Chase and GB13 Rayleigh Road have not been split. I question why GB16 NWT has been excluded, and if included could be split. I refer you to the Landscape Sensitivity Assessment and Outline Landscape Appraisal - November 2024 - 3 of 3, document 7.06. I question why GB16 North West Thundersley has been excluded from assessment, and there's no mention of PDL identified on maps, see pages 86 and 87, heavily highlighted in green. I'd compare this map to the DAC Planning Green Belt Assessment for Castle Point Borough Council July 2025 document 7.02, on page 67, which shows PDL of North West Thundersley, to see inconsistencies. The analysis is inconsistent, which shows poor knowledge and understanding of the site and surroundings being reviewed from desk based assessment of the sites. The scoring of the two GB8A and GB8B sites, addressing categories, but having different scores within the same complete boundary area shows the results are predetermined to favour one site.

22. The Strategic Land Availability Assessments (SLAA) - Site Assessments are not consistent and I would question the evidence within the report. I refer you to the Strategic Land Availability Assessments (SLAA) - Site Assessments - Benfleet, Hadleigh, Thundersley and Daws Heath - July 2025, document 10.13, see page 250. Using Site ID 43503, the Land south of Hadleigh, for example, we have Pluvial Flood Risk 6, lower fields are swamps, should be 3, Local Wildlife Sites 3, next to country park, should be 0, Badger Consultation Zone 6, badgers forage everywhere, should be 0, Conservation Area 2, Heritage impact, with heritage assets, like Florence Gardens, Seaview Terrace, Sayers Farmhouse, Park Farmhouse, should be a 0, Listed Buildings 2, next to a Castle, Seaview Terrace, and Mount Zion, all within 100m, should be 0, Topography 2, lower fields drop off more than 6%, should be 0, Employment Area Designation 4, Salvation Army site employs 40 people min, should be 2, Public Open Space 3, next to a country park, with footpaths, should be 0. This means the Suitability Score 58 becomes 33, which is more realistic, judged by those that know the area. It's interesting the Chase site, page 307 has a suitability score 45 compared to the Salvation Army site score of 58, so if you know the

area, we know which site needs protection. The scoring of the sites, addressing categories, but having different scores shows the results are predetermined to favour one site, and these all need reviewing.

23. As Head of the Save Hadleigh Farmland Group I have to question the validity of other Reg 19 responses, submitted as evidence, see Nr 1002 - The Salvation Army - Hodgson - Original Response. There is strong support expressed for protecting Hadleigh Farmland and the need for a South Hadleigh Green Lung as strategic green infrastructure asset, and we strongly agree with the Had2 policy to protect this site from any development. This site was dismissed in the old withdrawn local plan, for many reasons, respect to urban sprawl, being a buffer zone, effect on highways and traffic, lack of infrastructure, protecting farmland and wildlife, out of character, open space, heritage, archaeology, promoting historic links, and nothing has changed, except politics and developer greed. The documentation for the old sound local plan and this local plan all reiterate the many material objections, and the Salvation Army Farmland site has been excluded from every local plan. Both plans highlighted this site as an area for connectivity, wildlife corridors and expansion, which is part of the Had2 Policy. I refer you to the Sustainability Appraisal (SA) Scoping Report Annex B – Baseline Information June 2024, document 3.08, about protect existing sites for nature conservation from negative impacts, see page 74, connectivity opportunities. An unsound plan put's the Hadleigh farmland site at risk to speculative development, but alternatives are suggested to protect this site and other treasured Greenbelt sites. This local plan examination hearing though isn't a developer forum to be used as a sales pitch for a site that's not even included in any evidence document as viable, and not one evidence document mentions this site as potential Grey Belt, so any ludicrous request for this site to be designated Grey Belt should be dismissed instantly.

24. Modifications.

These remain as stated in my official response, with the only issue is the housing target being between 8,000 and 10,000 homes, based on the true housing need for Castle Point. We need to seriously consider North West Thundersley as a possible solution. We need to reduce our urban targets, especially on Canvey, but also on all our high streets, which is unsustainable. We need to add some Grey Belt / Greenbelt sites, which are the smaller non-intrusive true Grey Belt sites, and all additional sites need to come with infrastructure first. This needs to protect our other true precious Greenbelt / Grey Belt sites like Jotman's, Glebelands, Canvey West, Daws Heath and especially the Salvation Army Farmland from developers.

25. Conclusion.

We can all agree in Castle Point that as a unique Borough, with a vast amount of Greenbelt, but most of that is only accessible to a lapwing, but we all want to protect what is our true precious and highly treasured Greenbelt. As Head of the Save Hadleigh Farmland Group we welcome constructive dialogue to resolve the soundness issues of our local plan, and we all need to work collaboratively with residents, councils, and organisations to safeguard natural spaces for future generations.

Many documents tell a different story to the submitted local plan, which were issued late in the consultation process, and even hidden, but the community shouldn't be punished for these issues, with the loss of the Greenbelt. The local plan board, filled with Greenbelt activists, have admirably tried to deliver a Greenbelt free local plan as promised from day one, which is predetermination. There are signs that subconscious bias has affected site selections where for nonstrategic and political reasons, some sites has been decided more or less favourably in the assessment process. Whether the blame lies with the wrong method or ideology to achieve that is done, but we need a sound local plan that protects these sites for the next 17 years, and further.

Our Farmland site is still at risk with a local plan that will be found unsound, which will then lead to speculative development across our precious Greenbelt sites, with the Salvation Army Charity hovering like vultures over the dead carcass of our local plan. We need to safeguard the green belt's beauty and vitality through collaboration, education, and active community engagement, which raise awareness of the environmental and community value of our natural spaces.

Major Modifications are key to the resolution, but the right modifications for much needed housing in the right places, that still protects and preserves our precious green belt for current and future generations.

The over-densification and over-development with this plan will cause untold issues to the local urban areas, like Canvey and Hadleigh, when there are viable sites available which have not been seriously considered, like North West Thundersley.

There is no doubt that an infrastructure led growth scheme at the appropriate location, namely North West Thundersley, known as the Blinking Owl site, is possible and this would protect the Borough's other most treasured open spaces while giving the local plan a reasonable chance of being found sound. The site assessment for North West Thundersley, and sites under 100 homes, should be repeated with the correct balance of public benefits applied. Our Council will then have a choice between North West Thundersley, with smaller true grey belt sites, or they will add the Greenbelt sites they designated in the Grey Belt document, like Jotman's, Glebelands, and Canvey West, to their local plan.

We all want a sound local plan, that the residents of Castle Point can feel safe that our precious Greenbelt sites are safe from development, and we get the right homes, in the right places with infrastructure first.

Taking all the above points together, the local plan is based on a housing requirement which is below the standard housing target, derived from an inconsistent and a predetermined site selection process, and fails to meet the housing delivery target, with no Housing Delivery Test Action Plan. Furthermore, it does not demonstrate a deliverable housing land supply sufficient to meet even its own proposed requirement. The Plan is therefore not positively prepared, not justified and not effective, and cannot be relied upon as being found sound, without further modification.