

Castle Point Borough Council – Agenda Item 10 – Speaking Note – 9 September 2026

Council's Closing Remarks

We on this side of the room feel that the Council has worked hard to produce a plan for the Borough. It accommodates the maximum quantum of growth whilst ensuring that that growth remains sustainable. Noting that the directive in paragraph 6 of the NPPF, relates to delivery of sustainable growth. The evidence base is a robust one, noting that we need to come back to you in relation to matters of flood risk and sequential test. But the evidence base, whether one is looking to the green belt study or highways material is robust.

National policy, as the Inspectors are well aware, admits of departure from the standard method quantification of housing need. For example, expressly at paragraphs 62 and 69 in the NPPF "*where necessary it is acknowledged that not all boroughs will be able to meet their housing requirement as identified by the standard method*". Hence the need for other Boroughs to assimilate need from neighbouring Boroughs. That reality, as recognised by the NPPF, is consistent with the directive in paragraph 3, that the NPPF be read as a whole, to have regard to the full spectrum of planning considerations. It is that full spectrum that, in the present case, results in Castle Point being incapable of accommodating the degree of growth which the standard method directs for this area. And of course, as the Council knows the Inspectors are well aware, the Court of Appeal decision in West Berkshire states clearly and to the point that policy such as the NPPF must be, and is, subject to exceptions even when that policy is expressed unequivocally. And of course, in this instance, it is not.

The Council has started with the standard method number of 11,662. That is where matters began and indeed that is stated expressly in the plan itself as the Council knows the Inspectors will have noted. However, the Council has also considered development constraints, as the NPPF requires. For example, it has identified ecological constraints. In that regard, it has been led by the LNRS. It hasn't simply ploughed its own furrow. In that context an observation was fairly made that the LNRS, in terms of opportunity areas washes, if not entirely, fairly comprehensively, across the Borough when taken together with the APIBs. However, as the Council knows the Inspectors will also be aware, elsewhere in Essex, other Boroughs do not have such comprehensive coverage, and that is something that reflects the particular ecological constraints prevalent in this Borough as opposed to others.

Further, the Council in the context of highways has not ploughed its own furrow but has used the South Essex model and has liaised in detail and at length with Essex County Council. Further, Ms Morton's evidence has been very clear as to the extent of highways infrastructure constraints that serve to limit the development that can sustainably be accommodated within the Borough.

In terms of open space, a further constraint, as the Inspectors will have seen, is that none of that open space is surplus to requirements. And in so far as it is said that development on open space sites can provide open space, or that development on any sites can deliver more open space, that is acknowledged. But it is also important to recognise that open space provided as part of developments will largely serve to meet the needs of the new occupiers of those developments.

In relation to flooding matters, the Note that the Inspectors are going to receive tomorrow (10 September 2026) is going to speak to that.

In any event, the Inspectors have heard how these considerations, together with the evidence base more broadly, were put before members in July 2025, drawing together the evidential pieces of the puzzle previously put before members as and when they became available. That evidential platform has resulted in the strategy underpinning the plan submitted at Regulation 19.

That plan was submitted following the testing of a range of scenarios and it's that range of scenarios from which the 6,196 was drawn. Additional development would result in impacts beyond the Council's ability to sustainably manage it in the Borough. In this context it should be recalled that the previous plan, itself recommended for adoption, made provision for only 5,200 dwellings. The efforts that members and officers have made have produced a further 1,000 dwellings on top of that figure in order to seek to meet national policy and deliver on housing objectives.

This is a strategy which seeks to deliver a maximum quantum of housing whilst also respecting various considerations and in particular in this context it's a strategy which seeks to give effect to purpose five of the Green Belt purposes, to assist in urban regeneration and the recycling of urban land.

Finally, the Council note that the Inspectors have indicated unofficially that they have concerns. Obviously, the Council do not know the extent of those concerns, but what they do say is that no plan is perfect. And a degree of imperfection should not preclude progression of this plan towards adoption. The Council needs a plan, and what it wishes to see is a scenario where public benefits can be delivered, where development can be shaped through the democratic process, and so this Council is trying to deliver development by way of the plan-led system for which national policy advocates.