



## **CASTLE POINT PLAN 2026 to 2043**

### **CASTLE POINT BOROUGH COUNCIL RESPONSE TO TECHNICAL QUESTIONS**

**1 JULY 2026**



The Council welcomes the opportunity to respond to the technical questions as set out by the Planning Inspectors. The Council's response to each question is set out below.

**1. What is the rationale for the plan period starting in 2026/27 which is after the date of submission?**

- 1.1 The Castle Point Plan period covers 2026 to 2043. This is in accordance with paragraph 22 of the National Planning Policy Framework (NPPF), which requires strategic policies to look ahead over a minimum 15 year period from the point of adoption.
- 1.2 As the Castle Point Plan was submitted in January 2026 it is anticipated that the Examination of the Plan will occur during 2026, with adoption towards the end of the year or early 2027. The plan period therefore spans 17 years from the point of adoption.

**2. When will the monitoring data for the 2025/26 year be available?**

- 2.1 The housing monitoring data will be completed by 24 July 2026 and provided alongside the responses to the MIQs.

**3. There are discrepancies in the housing commitments figure and date between the Plan, the Housing Capacity Topic Paper [7.09] and the housing trajectory in the Housing Topic Paper [10.03]. What is the correct figure at 1 April 2025?**

- 3.1 The discrepancy in the date that has been provided is in the Castle Point Plan Regulation 19 Draft, with the date in the housing supply table under Policy SP3 quoted as 1<sup>st</sup> April 2023. Table 5 of the Housing Capacity Paper and Table 2 of the Housing Topic Paper list the date as of 1<sup>st</sup> April 2025.
- 3.2 The Council have already proposed a modification to correct the date set out in Policy SP3 [1.24 M19, page 6].
- 3.3 The Council are not aware of any discrepancies in the housing commitment figures between the three documents. The only difference in the tables, is the placement of the windfall allowance. In the Housing Supply table in the Castle Point Plan Policy SP3 this is the third row, where as in the Housing Capacity Paper this is the next to last row before the total supply figure.
- 3.4 Appendix 2 of the Housing Topic Paper [10.03 page 37] shows that the total existing commitments is 739 dwellings, this includes the contribution at Thorney Bay and does not take into account any replacement dwellings. However, when subtracting the 173 units at Thorney Bay and 86 units as Replacements (Losses) this gives an existing commitments total of 480 dwellings, which matches with the existing commitments figure in the Housing Supply tables in the three documents, where

replacements are already factored into the calculation and Thorney Bay is shown separately from existing commitments.

**4. What percentage of land in Castle Point is designated as Green Belt? There is an apparent inconsistency between para 17.2 of the Plan (55.9%) and para 6.1 of the Housing Capacity Topic Paper (53%) [7.09]**

4.1 There are multiple ways in which the area of the land designated as Green Belt in Castle Point can be calculated. This is because the Borough including both land and water areas due to the inclusion of the Thames Estuary within the borough boundary. Also the last time the Green Belt designation was updated by the Council was as part of the Adopted Local Plan in 1998. However, since that time, the MHCLG have sought removal of the Thames Estuary area from the Green Belt designation calculations as part of the yearly data returns. There is also further slight variations on Magic Map which is prepared by DEFRA.

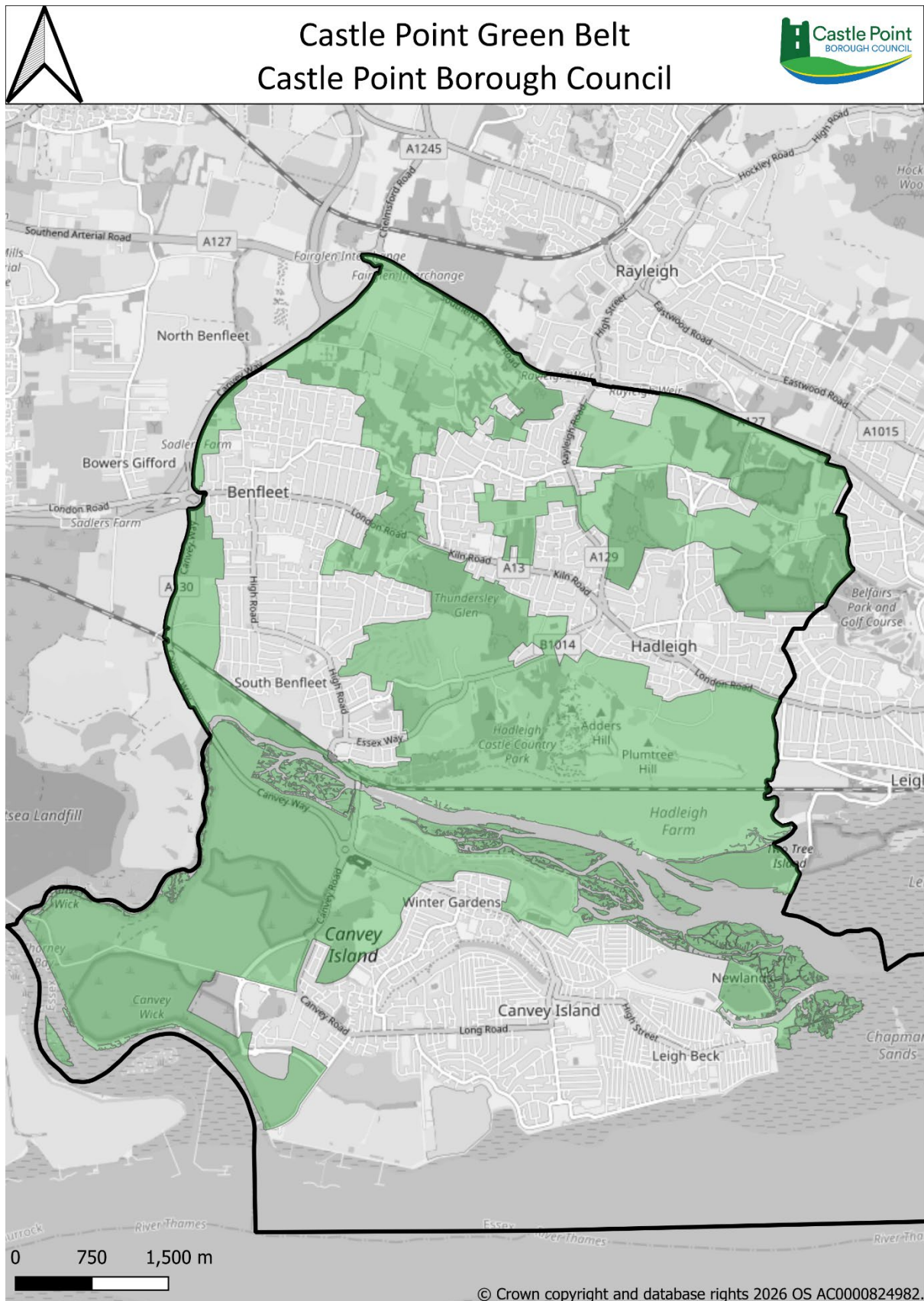
4.2 As result, the Council confirm that the figures that should be used are those set out in the 'Green Belt Statistics 2024/25' live table as of 9 October 2025<sup>1</sup>. This confirms that 2,500 ha of land is designated as Green Belt in Castle Point, which is 55.9% of the total land area (4,470 ha).

4.3 The map below uses the GIS data from MHCLG as of 13 November 2025<sup>2</sup>.

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<sup>1</sup> <https://www.gov.uk/government/statistics/local-authority-green-belt-statistics-for-england-2024-to-2025>

<sup>2</sup> <https://www.data.gov.uk/dataset/ccb505e0-67a8-4ace-b294-19a3cbff4861/english-local-authority-green-belt-dataset10>



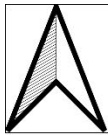
Map 1: Green Belt land designation

**5. Paragraph 17.4 of the Plan states around 32% of Green Belt land in the Borough is covered by national wildlife designations, ancient woodland or flood risk limitation. The Housing Capacity Topic Paper [7.09] states 22.8% of Green Belt land is affected by NPPF 'footnote 7 constraints' listed on page 22 of the topic paper as habitats sites, SSSI, ancient woodland and Flood Risk Zone 3b. What is behind the difference in these two percentages?**

5.1 As set out in answer to Q4 above, there are multiple government data sources with varying designations for the Green Belt in Castle Point. There has been a typing error in the Housing Capacity Topic Paper where it has been states that 22.8% of the Green Belt in the borough is affected by footnote 7 constraints.

5.2 For clarity and consistency, 795.2 ha of Green Belt land is covered by the following footnote 7 constraints; SPA, Ramsar, SSSI, Ancient Woodland, Flood Zone 3b, Scheduled Ancient Monuments and Listed Buildings. This equates to 32% (rounded from 31.8%) of the 2,500 ha of Green Belt in the Borough and is shown in the map below.

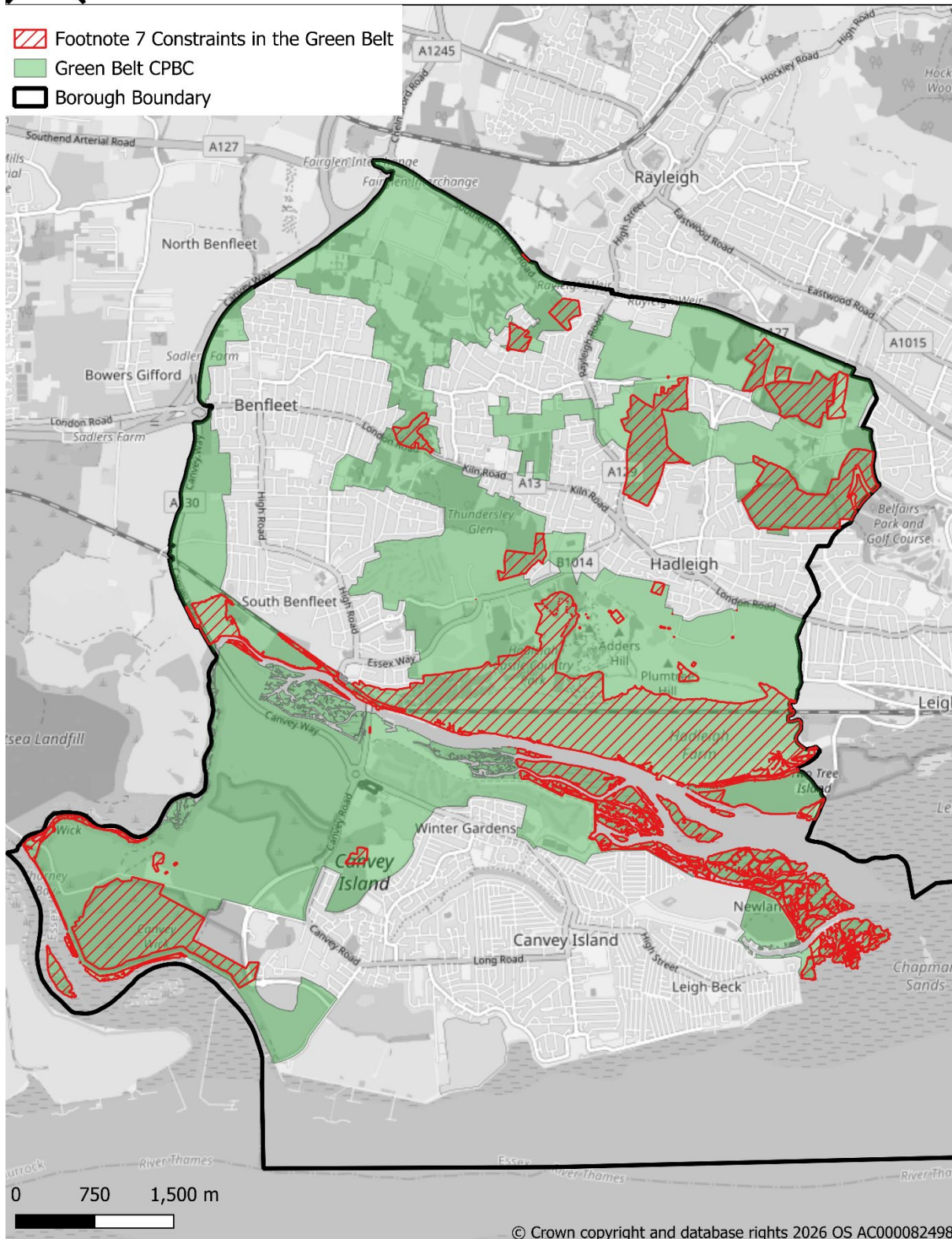
5.3 This can be cross referenced with the Green Belt Assessment [7.02, figure 8 page 42].



## Footnote 7 Constraints In the Green Belt Castle Point Borough Council



-  Footnote 7 Constraints in the Green Belt
-  Green Belt CPBC
-  Borough Boundary



Map 2: Green Belt and Footnote 7 Constraints

**6. Is there any update on Thurrock Council's position in being able to accommodate unmet need? (Statement of Common Ground with Thurrock Council 9 January 2026 paragraph 5.2)**

- 6.1 Since submission of the Castle Point Plan, Officers have continued to engage with all neighbouring authorities, through the South Essex Councils Joint Officer Group (JOG) meetings.
- 6.2 Officers at Thurrock and Castle Point Borough Council met as part of a Duty to Cooperate Meeting on 22 June 2026. Following this meeting, a letter has been received from Thurrock Council which sets out their current position. This is set out in Appendix 1.
- 6.3 Officers will continue to engage with each other during the preparation of the Thurrock Local Plan and the examination of the Castle Point Plan.

## **Appendix 1 – Letter from Thurrock Council 22 June 2026**

Civic Offices, New Road, Grays  
Essex RM17 6SL

22 June 2026

Amanda Parrott  
Assistant Director, Climate and Growth  
Castle Point Borough Council  
Kiln Road  
Thundersley, Benfleet  
Essex SS7 1TF

By Email

Dear Ms Parrott

### **Castlepoint Local Plan – Examination – Technical Question (17 June 2026)**

Thank you for the opportunity to respond, through yourselves, to your Inspectors' Question regarding an update on Thurrock Council's position in the ability to accommodate unmet housing need arising from the Castlepoint Local Plan.

I am happy to confirm that the Statement of Common Ground Castlepoint Council & Thurrock Council - 9 January 2026 continues to be operative. It is agreed that our Statement of Common Ground (SoCG) will need to be revised and updated in due course in relation to the contents of the Regulation 19 – Publication version of the Thurrock Local Plan when this is available.

Our timetable for the Thurrock Local Plan, as set out in the Local Development Scheme, anticipates publication and then submission of the Plan to the Inspectorate by December 2026.

Authority for the Publication of the Local Plan will be sought in an upcoming cycle of administrative meetings with a view towards commencement for the period of representations later in the summer. We will be continuing our engagement with yourselves and other neighbouring local authorities and others on matters of cross boundary and strategic concern as we progress.

Paragraph 5.2 of the Jan 26 SoCG states Thurrock Council (TC) *"is currently working on its new Thurrock Local Plan 2024 – 2044 and is reviewing its Green Belt and Grey Belt areas as well as assessing sites to ascertain whether it can meet its own housing needs. Consequently, at this moment TC is unable to confirm whether it can assist CPBC in meeting its unmet housing need."*

To assist I would simply add that since the last iteration of the SoCG we have given full consideration of consultation responses, including from Castle Point Council and carried out further work updating the evidence base for the Plan. This includes having completed a Green Belt Assessment review including to address "Grey Belt", further studies of Housing supply issues and related matters such as infrastructure delivery and viability. With these in mind it is **very probable that there will not be any available capacity arising in the Thurrock Local Plan – Publication Version which would contribute towards assisting Castlepoint's identified unmet housing need.**

We would be happy to engage further to maintain our effective cooperation with Castlepoint Borough Council on this matter and other related issues and the Thurrock Local Plan and to update the SoCG. The Council's Cabinet is scheduled to next meet on 15<sup>th</sup> July. Alex Ross will be in touch shortly to set a date.

Through yourselves I would add that, should this be helpful, at the time that this topic comes forward for discussion at the Inspectors' Hearings later in the year we can make ourselves available if required to attend to confirm further and to assist the Examination.

Yours sincerely,

*Philip James*

Philip James  
Planning Policy and Implementation Manager