Planning Inspectorate

Examination of the Castle Point Plan

Note following initial hearings.

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2 November 2026

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

Dear Ms Parrott,

Background

1. We are writing following the close of the hearing sessions we held on 9 and 10 September 2026.

2. We had previously stated that we had significant concerns about the soundness of the Castle Point Plan and set out an overarching question and two supplementary questions in our note of 17 June 2026. At the sessions we worked through these questions and the written and verbal responses given by the Council and participants. We would like to thank the Council and all participants for their contributions.

3. We have now considered all of this evidence in so far as it relates to our questions.

Our findings

4. The plan's housing provision meets only around 53% of the standard method requirement of 11,622 homes. We consider that whilst the Council may not be able to meet the full standard method requirement figure, it could make provision significantly beyond that set out in the submitted plan. We have some major concerns about the methodology adopted and some elements of the evidence base. In particular we have concerns about the robustness and application of the evidence as it relates to Green Belt assessment, the sequential approach to flood risk, the consideration of constraints and some aspects of the sustainability appraisal.

5. Although we did not examine any of those omission sites which were not in the submitted plan but which were recommended for further consideration in the DCA Green Belt Study, we tested out a number of them simply by way of example. The answers to our questions, verbally and in writing lead us to conclude that the evidence put forward by the Council in relation to constraints as justification for not allocating such sites is very weak. For example, we do not consider that the option for mitigation has been properly explored for in relation to matters such as transport, open space and some nature conservation sites.

6. We find it difficult to accept that some sites on the edge of the urban area are not, or could not be made, accessible as expected by the National Planning Policy Framework. It would be an option for the plan to set out specific policy requirements for any allocation and such policy requirements may be a way of ensuring mitigation measures could be implemented. We are concerned that such an approach has been dismissed.

7. We are concerned that some of the sites which were found to be sound by the Inspector examining the New Castle Point Local Plan in 2022 have been dismissed by the Council in preparing this plan. That Inspector found that exceptional circumstances existed to remove a number of sites from the Green Belt. We have only looked at the evidence base informing this plan and we do not reach a position on any omission site as they are not before us. However, what we have found leads us to not be confident about the robustness of the approach adopted by the Council.

8. We have concerns about the Council's Green Belt Assessment such as aspects of its approach to the assessment of grey belt and the reasons given for excluding some sites from further consideration. Overall, we do not consider the assessment and then the process of looking at whether altering Green Belt boundaries to meet more of the areas objectively assessed housing need would fundamentally undermine the purposes (when taken together) of the remaining Green Belt when considered across the area of the Plan, to be sound.

9. At this stage we have not set out to examine the soundness of any of the allocations in the submitted plan. However, as stated by us at the end of the hearing session on day two, we have concerns about the robustness of some of the evidence base which supports them. The 6,196 figure therefore cannot necessarily be relied upon until we have examined all allocations thoroughly along with the housing supply data.

10. We recognise that meeting the 11,662 standard method requirement may be challenging in Castle Point. Nevertheless, we consider that not making provision significantly towards it has not been justified.

11. In our view, there is a strong likelihood that several sites in the Green Belt, over and above those which have planning permission for housing, could meet the relevant tests set out in national policy and could therefore come forward as potential allocations.

12. We do not consider that the evidence before us supports the Council's position that the adverse impacts of meeting all or more of the areas objectively assessed housing needs significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework when taken as whole.

13. This means that in relation to our overarching question, we consider that the housing requirement of 6,196 over the plan period set out in Strategic Policy SP3 is not positively prepared, justified or consistent with national policy.

14. As a result of our findings on this matter, we consider the Plan as submitted to be unsound and we will not be progressing to examine other parts of the Plan at the moment.

Next steps

15. At the close of the hearing session on 10 September the Council confirmed that it was willing to work with us to achieve a sound plan for Castle Point.

16. We now require the Council to confirm, by formal resolution, within six weeks of the date of this letter, that it agrees to propose to delete from the Green Belt and allocate for housing development in the draft plan, specific sites currently in the Green Belt (over and above those which have planning permission) which accord with national policy and which would take the provision of new housing up to, or significantly nearer to, the standard method requirement. The altered draft plan would need to be subject to public consultation before being submitted to us for examination.

17. Once the Council confirms the above we will then set out details of the work which would be required and agree a project plan with a clear timetable for actions whilst the examination would be paused.

18. We will not be accepting any further correspondence from other parties on this matter. A copy of this letter should be placed on the examination website as soon as possible.

Mike Worden and Catherine Carpenter

INSPECTORS