

## **Appendix 3: Duty to Cooperate Letters**



Climate & Growth  
Castle Point Borough Council,  
Council Offices, Kiln Road,  
Thundersley, Benfleet,  
Essex, SS7 1TF  
[www.castlepoint.gov.uk](http://www.castlepoint.gov.uk)

Christine Lyons  
Executive Director for Growth and Partnerships  
Basildon Borough Council  
Via email

Date: 30 January 2025

Dear Christine,

### **Request for Assistance under the Duty to Cooperate**

I am writing to your authority under the Duty to Cooperate (DTC) to enquire whether it can assist Castle Point Borough Council in meeting its housing needs. A requirement of the DTC legislation is for planning authorities to engage constructively, with a view to finding solutions to address strategic matters which have cross boundary implications.

Castle Point is a small borough of just 17 square miles with an existing population density of 5,278 people per square mile.

Following consultation on the [Issues and Options Castle Point Plan](#) in Summer 2024, the Council were preparing a Plan to meet its identified local housing need of 5,100 homes (255 dpa) over the Plan Period to 2043. This figure being lower than the then government's Standard Methodology figure of 7,100 new homes (355 dpa) to 2043. The Local Housing Needs Assessment identified there were exceptional circumstances that justified a move away from the Standard Methodology due to the over estimation within the Standard Methodology regarding migration into the borough which had artificially inflated the overall housing requirement.

The government have now published a revised National Planning Policy Framework (NPPF) in December 2024, which changes the context for which the Castle Point Plan must be prepared. This removes the ability for Local Planning Authorities to set out exceptional circumstances to justify a different housing need than identified through the Standard Methodology. Therefore, the revised housing need for Castle Point is 14,020 new homes (701 dpa) to 2043.

As a result of this significant increase in housing need and removal of exceptional circumstances to justify a different housing need than set out in the Standard Method, the Council is reviewing the Castle Point Plan and undertaking further evidence to support the Plan such as a Green Belt Review, including identification of Grey Belt land. It is considered that the vast majority of the Green Belt in Castle Point fulfils a strong purpose, and there is

clear evidence that development in the Green Belt, including on some previously developed land within strategic gaps, may fundamentally undermine the function of the Green Belt.

The borough is heavily constrained by nature conservation constraints including the Benfleet and Southend Marshes Special Protection Area and Ramsar Site, six Sites of Special Scientific Interest, and swathes of land that are ancient woodland or priority habitat. Furthermore, the landscape provides the setting for Scheduled Monuments including Hadleigh Castle and a Roman roundhill. Approximately 50% of the borough's area is affected by tidal flood risk. This includes elements of the borough's area which sit outside the tidal defences.

To this end, Castle Point Borough Council is seeking to secure its growth within the existing urban areas by optimising urban land through regeneration and renewal. It is considered that through this approach we can meet our locally assessed housing need of 255 homes per annum or 5,100 homes over a 20-year period. It is not however possible to deliver housing growth substantially above this level without impacting on the fundamental purpose of the Green Belt, on nature conservation, on key heritage assets, or by increasing the risk from flooding.

We are therefore seeking your views on whether your authority can assist in any way to meeting our housing figure of 14,020 new homes.

Following publication of the NPPF in December 2024, the Council have revised the Local Development Scheme (LDS) which sets out the timetable for the Castle Point Plan. The [LDS](#) was approved on 29<sup>th</sup> January 2025. The timetable for the Castle Point Plan is summarised below:

- Regulation 19 Consultation – April to May 2025
- Submission – June 2025
- Examination – July 2025 to January 2026
- Adoption – April 2026

Due to this rapid timetable, I request a response by 21 February 2025. We would also like to offer the opportunity for you to meet with officers and discuss the evidence base to date and a further meeting once the additional evidence including the Green Belt Review and Site Assessments have concluded. Please let us know if you would like to meet with us.

If you require any assistance in terms of the matters raised in this letter, please do not hesitate to contact [planningpolicy@castlepoint.gov.uk](mailto:planningpolicy@castlepoint.gov.uk)

Yours faithfully,

**Amanda Parrott**  
*Assistant Director, Climate and Growth*

Date: 10 March 2025  
Department: Planning Strategy and Implementation Team  
Tel. No: 01268 533333 (Option 5)  
Email: [planningpolicy@basildon.gov.uk](mailto:planningpolicy@basildon.gov.uk)

Sent via email to [REDACTED]

**RE: YOUR REQUEST FOR ASSISTANCE UNDER THE DUTY TO COOPERATE**

I write in response to your authority's letter dated 30 January 2025 enquiring whether Basildon Borough Council can assist Castle Point in meeting its housing needs. A requirement of the DTC legislation is for planning authorities to engage constructively, with a view to finding solutions to address strategic matters which have cross-boundary implications.

As you are aware, Basildon Borough Council is preparing a new draft Local Plan which is currently at Regulation 18 stage. Consultation on a first draft Regulation 18 Local Plan ended in January 2025. A second, focussed consultation has recently launched. When adopted, the Plan will eventually replace the Saved Policies from the Basildon District Local Plan (1998).

The Government published a revised National Planning Policy Framework (NPPF) in December 2024, and this has changed the wider context against which the Council's Local Plan must be prepared. The revised Standard Methodology requires that Basildon Borough Council delivers 27,111 new homes over the lifespan of the Local Plan, an uplift of around 25% from the most recent figures (1,039 per annum/20,780 in total) under the previous Standard Method.

As a consequence, achieving this highly challenging target will require Basildon Borough to accommodate its own needs entirely within its boundaries. Basildon's urban capacity evidence identifies that 10,000 homes (approximately 36%) can be accommodated on Brownfield sites within the urban areas. The Council must therefore identify capacity for approximately 17,000 homes within the borough's Green Belt, as none of the fellow Essex Local Planning Authorities are able to assist Basildon in meeting its needs.

As such, there is no capacity in the Council's proposed Spatial Strategy to accommodate any unmet housing need from neighbouring or nearby local authorities, including Castle Point Borough Council. The Council is also affected by changes to the national Green Belt and Grey Belt policies, and must respond accordingly. The Council also revised its Local Development Scheme following the NPPF publication. Most significantly, Basildon Borough Council remains under the threat of Government intervention if its plan-making is derailed.

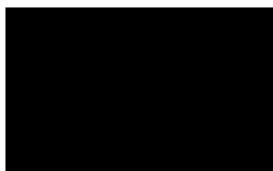
Basildon Borough Council therefore considers that it is unable to assist Castle Point Borough Council in meeting its housing needs at this time.

However, we will continue to engage constructively with your authority through the Duty-to-Cooperate process on all relevant matters where there are cross-boundary implications. This includes any potential development close to the boundary along the A127 and A130.



**Basildon Council**

Yours sincerely,



**Michael Murrell**  
Assistant Director for Growth and Partnerships  
Basildon Borough Council



**Basildon Council**

Date: 16<sup>th</sup> September 2025  
Department: Planning Strategy and Implementation Team  
Tel. No: 01268 533333 (Option 5)  
Email: [planningpolicy@basildon.gov.uk](mailto:planningpolicy@basildon.gov.uk)

Sent via email to Amanda Parrott Assistant Director Climate and Growth  
[REDACTED]

### **REQUEST FOR ASSISTANCE UNDER THE DUTY TO COOPERATE**

I am writing to your authority under the Duty to Cooperate (DTC) to enquire whether it can assist Basildon Borough Council in meeting its housing and Gypsy & Traveller needs. A requirement of the DTC legislation is for planning authorities to engage constructively, with a view to finding solutions to address strategic matters which have cross-boundary implications.

Following its Issues and Options consultation during Summer 2023, the Council consulted on a draft Regulation 18 Local Plan in November of 2024 and in March of 2025. These identified draft site allocations for growth, as part of an overall strategy for meeting the borough's identified growth needs. To accommodate the changes in the National Planning Policy Framework that have taken place, we are undertaking a Regulation 18 consultation at the end of this year. When adopted, the Plan will eventually replace the Saved Policies from the Basildon District Local Plan (1998).

Responses to our consultations have identified that housing provision is a major issue for the new Local Plan. There was some support for releasing land from the Green Belt, however many responses equally looked to protect it.

#### **Housing Need**

Using the Government's new Standard Methodology, Basildon Borough's assessed housing need is 26,909 homes over the lifetime of the Local Plan, at least 10,420 of which are to be affordable homes. New evidence work, including a new Green Belt Assessment, indicates there is unlikely to be sufficient land available to meet housing needs in the borough, as around 10,000 homes can be accommodated in the urban area, giving a significant deficit against the overall requirement. As such we request your assistance in the delivery of housing under the Duty to Cooperate.

#### **Gypsy & Traveller Need**

Basildon Council's Gypsy and Traveller Accommodation Assessment was undertaken by ORS and completed in October of 2024. Following this, the Council undertook a 'Call for Sites' exercise from the 5<sup>th</sup> November 2024, which ran for a period of six weeks until the 17<sup>th</sup> December identify a supply of sites sufficient to meet the accommodation needs identified in the GTAA. The Council contacted key stakeholders, utilising their network of contacts to encourage engagement with the Gypsy, Traveller and Travelling Showpeople community in the call for sites process and to help foster an ongoing dialogue. No further gypsy and traveller sites have been identified.

A criteria-based policy has been developed for Gypsy & Traveller accommodation. The Council consulted on this in its draft Regulation 18 Part 2 consultation in March 2025.



**Basildon Council**

Basildon Council has a need for an overall 302 pitches across the Plan Period. While the Council must explore the release of land from Green Belt, alternative options must also be explored to identify further capacity given the lack of brownfield sites in the borough.

Our current trajectory is set out as below:

Our need is:

Period	2023-27	2028-32	2033-37	2038-40	Total
Est. no of pitches	214	30	32	26	302

Our best projection of supply is:

Period	2023-2028	2029-2034	2035-2039	2040-2043
Est. no of pitches to be delivered	113	185	4	0

A requirement of the DTC legislation is for planning authorities to engage constructively, with a view to finding solutions to address strategic matters which have cross-boundary implications. Basildon Council is looking to establish whether any local authorities within Essex could share their growth of Gypsy and Traveller pitches in the first five years of the Local Plan period. In return, Basildon Council would look to provide the same number of pitches in 10-15 years' time and potentially contribute towards funding requirements.

We consider that we can meet the full need over the course of the Plan Period up to 2043, but over the period 2023-2032 we need to secure 234 pitches. As we are dependent on amending Green Belt Boundaries, we are only able to deliver around 124 pitches in this time period.

We are looking for assistance to deliver an additional 110 pitches by 2032. We will in turn commit to providing an equivalent number of pitches in the period 2032-2043 as we do seek to cooperate with and support you. We would welcome the opportunity to discuss what arrangements may be possible.

Basildon Council would ask if you can please respond on the following matters:

- Are there any Local Authority or Registered Provider-owned Gypsy & Traveller sites in your Council area?
- If there are any Local Authority or Registered Provider-owned sites, are you able to expand them?
- Are there any privately-owned sites in your council area?
- Have you identified any privately-owned sites with the ability to expand?
- When did you last undertake a call-for-sites for Gypsy & Traveller accommodation?
- Were any sites identified to you through this process?
- Has land been promoted to you by any other means for such a purpose?
- Has a Green Belt review been carried out which is up to date (i.e. compliant with the February 2025 Green Belt PPG) or is an update being prepared?



**BasildonCouncil**

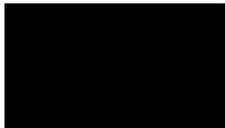
- If so, has it identified any potential Gypsy & Traveller pitch options?
- If not, have any other potential Gypsy & Traveller pitch options been identified?
- Have you identified any sites that could be developed for Gypsy & Traveller accommodation (subject to funding or otherwise)?

We would like to suggest arranging a workshop to discuss Gypsy & Traveller provision between Basildon, Thurrock, and Brentwood. We feel this may be able to allow us to engage more constructively and find solutions to meet our collective needs. Should you wish to be part of this wider workshop please let us know.

I thank you for your ongoing cooperation in the preparation of the Draft Basildon Local Plan, support in meeting the future housing needs in Basildon, as well as the future housing needs across of all South Essex.

I look forward to receiving your response and continuing work constructively and cooperatively.

Yours Sincerely,



Michael Murrell  
Assistant Director Planning, Regeneration & Economic Development  
Basildon Borough Council



Basildon Council



Climate & Growth  
Castle Point Borough Council,  
Council Offices, Kiln Road,  
Thundersley, Benfleet,  
Essex, SS7 1TF  
[www.castlepoint.gov.uk](http://www.castlepoint.gov.uk)

21<sup>st</sup> November 2025

Michael Murrell  
Assistant Director, Planning, Regeneration & Economic Development  
Basildon Borough Council  
Sent via email to: [REDACTED]

### **Basildon Borough Council Request for assistance under the Duty to Cooperate**

Dear Michael,

I write in response to your authority's letter dated 16<sup>th</sup> September 2025 enquiring whether Castle Point Borough Council can assist Basildon Borough Council in meeting both its housing needs and Gypsy and Traveller pitch needs. A requirement of the Duty to Cooperate legislation is for planning authorities to engage constructively, with a view to finding solutions to address strategic matters which have cross boundary implications.

As you are aware, Castle Point Borough Council has just completed its Local Plan Regulation 19 Consultation and intends to submit its local plan for examination by the end of this year with a view to adopt it in Autumn 2026.

#### **Housing Need**

As noted, the publication of the revised National Planning Policy Framework (NPPF) in December 2024 resulted in a change in the context of how Local Plans should be prepared but also how housing need was calculated. The revised Standard Methodology required that the Castle Point Plan should deliver 686 dpa equating to 11,662 homes over the plan period 2026 to 2043. This significantly exceeds the local housing needs assessment conducted by ORS in 2023 which identified a local housing need of 255dpa and furthermore it exceeds the previous government's standard methodology of 355dpa.

Castle Point is a small borough of just 17.4 square miles with an existing population of 4,976 people per square mile. It is also heavily constrained by designated green belt, nature conservation constraints including the Benfleet and Southend Marshes Special Protection Area and Ramsar Site, 6 sites of Special Scientific Interest, and swathes of land that are ancient woodland or priority habitat. Furthermore, the landscape provides the setting for Scheduled Monuments including Hadleigh Castle and a Roman Roundhill. Approximately 50% of the borough's area is affected by tidal flood risk some of which is outside the tidal defences.

The Council conducted a Green Belt Assessment in July 2025 as well as a Housing Topic paper July 2025 to review land use across the borough and to assess where additional capacity for sustainable development might be. Based on this evidence, Castle Point Borough Council aims to deliver 6,196 homes over the plan period 2026 to 2043 which equates to 364dpa, mainly through urban intensification and brownfield redevelopment.

Despite this being a considerable amount of growth and as stated within the confines of a small borough with significant constraints, there is still a shortfall of 5,466 dwellings

Consequently, Castle Point Borough Council is unable to assist Basildon Borough Council with its unmet housing need.

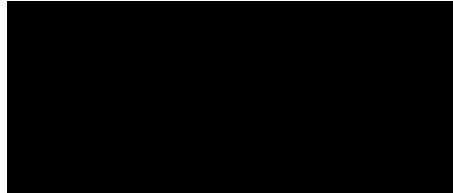
### **Gypsy and Traveller Need**

Castle Point Borough Council conducted a Gypsy and Traveller Accommodation Assessment in November 2024, which identified that there was a need for 18 pitches within Castle Point. There are three authorised Gypsy and Traveller sites within the authority area, all of which are privately owned. Castle Point's identified pitch need can be met by the intensification of pitch provision at Orchard Place and Janda Fields. There is no further scope for expansion or intensification at these sites or at a third site at Watlington Road, Benfleet. There was a call for sites from July to September 2024, which included Gypsy and Traveller sites, and no additional sites came forward.

Consequently, Castle Point Borough Council is unable to assist Basildon Borough Council with its unmet Gypsy and Traveller need. However, the Council will continue to engage constructively with your authority through the Duty to Cooperate process including workshops to assist in finding solutions to Basildon's unmet need in this area.

If you have any queries regarding this letter, please do not hesitate to contact me via [CPPlan@castlepoint.gov.uk](mailto:CPPlan@castlepoint.gov.uk)

Yours sincerely,



**Amanda Parrott**

**Assistant Director, Climate and Growth**



Climate & Growth  
Castle Point Borough Council,  
Council Offices, Kiln Road,  
Thundersley, Benfleet,  
Essex, SS7 1TF  
[www.castlepoint.gov.uk](http://www.castlepoint.gov.uk)

Emma Goodings  
Director of Place  
Brentwood Borough and Rochford District Councils  
Via email

Date: 30 January 2025

Dear Emma,

### **Request for Assistance under the Duty to Cooperate**

I am writing to your authority under the Duty to Cooperate (DTC) to enquire whether it can assist Castle Point Borough Council in meeting its housing needs. A requirement of the DTC legislation is for planning authorities to engage constructively, with a view to finding solutions to address strategic matters which have cross boundary implications.

Castle Point is a small borough of just 17 square miles with an existing population density of 5,278 people per square mile.

Following consultation on the [Issues and Options Castle Point Plan](#) in Summer 2024, the Council were preparing a Plan to meet its identified local housing need of 5,100 homes (255 dpa) over the Plan Period to 2043. This figure being lower than the then government's Standard Methodology figure of 7,100 new homes (355 dpa) to 2043. The Local Housing Needs Assessment identified there were exceptional circumstances that justified a move away from the Standard Methodology due to the over estimation within the Standard Methodology regarding migration into the borough which had artificially inflated the overall housing requirement.

The government have now published a revised National Planning Policy Framework (NPPF) in December 2024, which changes the context for which the Castle Point Plan must be prepared. This removes the ability for Local Planning Authorities to set out exceptional circumstances to justify a different housing need than identified through the Standard Methodology. Therefore, the revised housing need for Castle Point is 14,020 new homes (701 dpa) to 2043.

As a result of this significant increase in housing need and removal of exceptional circumstances to justify a different housing need than set out in the Standard Method, the Council is reviewing the Castle Point Plan and undertaking further evidence to support the Plan such as a Green Belt Review, including identification of Grey Belt land. It is considered that the vast majority of the Green Belt in Castle Point fulfils a strong purpose, and there is

clear evidence that development in the Green Belt, including on some previously developed land within strategic gaps, may fundamentally undermine the function of the Green Belt.

The borough is heavily constrained by nature conservation constraints including the Benfleet and Southend Marshes Special Protection Area and Ramsar Site, six Sites of Special Scientific Interest, and swathes of land that are ancient woodland or priority habitat. Furthermore, the landscape provides the setting for Scheduled Monuments including Hadleigh Castle and a Roman roundhill. Approximately 50% of the borough's area is affected by tidal flood risk. This includes elements of the borough's area which sit outside the tidal defences.

To this end, Castle Point Borough Council is seeking to secure its growth within the existing urban areas by optimising urban land through regeneration and renewal. It is considered that through this approach we can meet our locally assessed housing need of 255 homes per annum or 5,100 homes over a 20-year period. It is not however possible to deliver housing growth substantially above this level without impacting on the fundamental purpose of the Green Belt, on nature conservation, on key heritage assets, or by increasing the risk from flooding.

We are therefore seeking your views on whether your authority can assist in any way to meeting our housing figure of 14,020 new homes.

Following publication of the NPPF in December 2024, the Council have revised the Local Development Scheme (LDS) which sets out the timetable for the Castle Point Plan. The [LDS](#) was approved on 29<sup>th</sup> January 2025. The timetable for the Castle Point Plan is summarised below:

- Regulation 19 Consultation – April to May 2025
- Submission – June 2025
- Examination – July 2025 to January 2026
- Adoption – April 2026

Due to this rapid timetable, I request a response by 21 February 2025. We would also like to offer the opportunity for you to meet with officers and discuss the evidence base to date and a further meeting once the additional evidence including the Green Belt Review and Site Assessments have concluded. Please let us know if you would like to meet with us.

If you require any assistance in terms of the matters raised in this letter, please do not hesitate to contact [planningpolicy@castlepoint.gov.uk](mailto:planningpolicy@castlepoint.gov.uk)

Yours faithfully,

**Amanda Parrott**  
*Assistant Director, Climate and Growth*



Castle Point Borough Council  
Climate & Growth  
Council Offices, Kiln Road  
Thundersley, Benfleet  
Essex, SS7 1TF

Date: 7 March 2025

Dear Ms, Parrott

**Request for assistance under the duty to cooperate**

Thank you for your letter dated January 30, 2025, regarding the Duty to Cooperate (DTC) and the housing needs of Castle Point Borough Council. We appreciate your proactive approach in seeking collaboration on this critical issue.

**Unmet Housing Need**

While we recognise the significant housing demand in Castle Point, we must clarify that the Brentwood Borough faces its own constraints that limit our ability to accommodate additional housing needs. Key factors include:

1. **Limited Land Availability:** The borough faces significant constraints due to its geographical boundaries and existing land use policies. With the Metropolitan Green Belt covering over 13,300 hectares, representing 87% of the borough's total area, the potential for new housing developments is severely restricted. This challenge is further compounded by the scarcity of available brownfield sites suitable for residential development. As the Council undertakes a Local Plan Review, it will be difficult to address our substantial housing needs, making it unfeasible to accommodate any unmet demand from Castle Point Borough or other areas.
2. **Environmental Considerations:** Many areas within our district are subject to environmental protections, including areas of ecological significance. This includes 3 Sites of Special Scientific Interest, 15 ancient woodlands, 6 Country Parks and 147 Local Wildlife Sites. These constraints further limit the feasibility of large-scale housing projects.
3. **Infrastructure Limitations:** The current infrastructure, including transport, schools, and healthcare facilities, is already under pressure. Any significant increase in

housing would necessitate substantial investment in infrastructure, which is not currently feasible.

## **Conclusion**

In summary, while we are committed to working collaboratively to address housing needs, the specific circumstances in Brentwood present significant barriers to meeting the general housing demand. With these significant challenges meeting our own needs we confirm that we are unable to accommodate any unmet need arising from Castle Point. We appreciate your understanding of these challenges and look forward to exploring potential solutions together.

Thank you for your attention in this matter. Should you require any further information or wish to discuss this in greater detail, please do not hesitate to contact me.

Yours sincerely

**Emma Goodings**  
**Director - Place**  
Brentwood Borough Council & Rochford District Council

Castle Point Borough Council  
Climate & Growth  
Council Offices, Kiln Road  
Thundersley, Benfleet  
Essex, SS7 1TF

Email: [REDACTED]

Tel: 01277 312984

Date: Friday, 07 March 2025

Dear Ms. Parrott

**Request for assistance under the duty to cooperate**

Thank you for your letter dated January 30, 2025, regarding the Duty to Cooperate (DTC) and the housing needs of Castle Point Borough Council. We appreciate your proactive approach in seeking collaboration on this critical issue.

**Unmet Housing Need**

While we recognise the significant housing demand in Castle Point, we must clarify that the Rochford district faces its own constraints that limit our ability to accommodate additional housing needs. Key factors include:

- Limited Land Availability:** The Rochford district faces significant constraints on land supply, particularly in urban areas. Situated on a peninsula bordered by the Crouch, Roach, and Thames Estuaries, over 40% of Rochford's land area has a greater than 1 in 1000 probability of flood risk in any given year. The Metropolitan Green Belt covers over 12,400 hectares of land, and the availability of non-Green Belt land is further limited by the Ministry of Defence designation around Foulness Island in the eastern portion of the district. Existing planning policies prioritise the protection of green spaces and the Green Belt, restricting the potential for new housing developments. As the Council develops a new Local Plan, it will be challenging to meet our significant housing needs, making it impossible to accommodate any unmet need from Castle Point Borough or other areas.
- Environmental Considerations:** Many areas within our district are subject to environmental protections, including flood zones and areas of ecological significance. The district is home to approximately 12,000 hectares of inland and marine habitats of international importance, with over 15% of our landmass covered

by one or more biodiversity designations. These constraints further limit the feasibility of large-scale housing projects.

3. **Infrastructure Limitations:** The current infrastructure, including transport, schools, and healthcare facilities, is already under pressure. Any significant increase in housing would necessitate substantial investment in infrastructure, which is not currently feasible.

## **Conclusion**

In summary, while we are committed to working collaboratively to address housing needs, the specific circumstances in Rochford present significant barriers to meeting the general housing demand. With these significant challenges meeting our own needs we confirm that we are unable to accommodate any unmet need arising from Castle Point. We appreciate your understanding of these challenges and look forward to exploring potential solutions together.

Thank you for your attention in this matter. Should you require any further information or wish to discuss this in greater detail, please do not hesitate to contact me.

Yours sincerely

**Emma Goodings**  
**Director – Place**



**Climate and Growth  
Castle Point Borough  
Council**  
Council Offices, Kiln Road,  
Thundersley, Benfleet  
Essex SS7 1TF  
Tel: 01268 882200

[planningpolicy@castlepoint.gov.uk](mailto:planningpolicy@castlepoint.gov.uk)

By email: [planning.policy@chelmsford.gov.uk](mailto:planning.policy@chelmsford.gov.uk)

19<sup>th</sup> June 2024

Dear Mr Potter,

**Chelmsford Local Plan Review Preferred Options Consultation**

I am writing on behalf of Castle Point Borough Council in response to the consultation underway on the Chelmsford Local Plan Review Preferred Options Consultation.

***Housing and Employment Growth***

We have reviewed the preferred options document and welcome your proposals around employment and housing growth. It is noted that you have now sought to balance housing growth with employment growth through the plan, and that you have given consideration to the impacts of growth in South East Chelmsford on the strategic highway network that connects into South Essex.

You will recall that Castle Point Borough Council wrote to you in the summer of 2022, requesting that you consider whether it would be possible to accommodate any unmet need arising within Castle Point as part of the Chelmsford Local Plan. You replied that autumn indicating that you did not feel it would be possible to do so.

Since that time, Castle Point has undertaken an extensive review of its urban capacity and has identified the potential to accommodate around 3,730 homes over a 20-year period. This figure has been arrived at by optimising capacity on brownfield sites and other sites in the existing urban area and includes extant consents and a windfall allowance.

This capacity compares to our locally assessed housing need of 5,100 homes over the same period. We intend to commence engagement on our Issues and Options document in July where this information will be detailed in full.

As will see, there remains a shortfall in capacity compared to our locally assessed housing need of the order of 1,400 homes. Due to the constrained nature of Castle Point it is unlikely that this shortfall compared to locally assessed housing need can be accommodated within the borough without incursion into the Green Belt. The NPPF is clear at paragraph 146 that the Green Belt should only be reviewed in exceptional circumstances and only once specific actions have been taken.

As set out above we have thoroughly examined urban capacity and the ability to optimise sites. It is now necessary to ask again whether neighbouring authorities can accommodate some of the identified need for development.

As you will be aware our neighbours in South Essex are similarly constrained by the Green Belt and therefore it is appropriate to ask you to confirm the position of Chelmsford City Council at this time in respect of whether it is possible to accommodate any of the unmet need arising in Castle Point outside of the Green Belt.

### ***Cross Boundary Considerations***

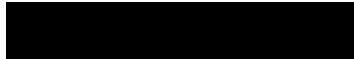
In respect of the previous consultation on the Chelmsford Local Plan Review we raised two cross boundary issues that have not been fully addressed in the Preferred Options Document, and which are repeated below.

**Sustainable connectivity with South Essex** – sustainable transport connectivity is poor between South Essex and Chelmsford. This is particularly the case for Castle Point which has no rail connectivity with Chelmsford and where it takes around 2 hours to get to Chelmsford by bus. The consequence of this is a high proportion of movements being by car, and those who do not have a car being excluded from employment opportunities in Chelmsford. In the reverse this has a stifling effect on Chelmsford's economy. There is therefore a need for joint working between South Essex authorities through SEC, Chelmsford City Council and Essex County Council to improve sustainable travel connectivity north-south. This should be reflected in the Chelmsford City Local Plan Review.

**Thames Freeport** – whilst other national infrastructure projects have been considered in the preparation of the Chelmsford Local Plan Review Preferred Option consultation, no consideration has been given to the Thames Freeport. Initial indications are that the Freeport will generate a substantial level of economic activity driving the need for labour and employment floorspace across the wider area. This will most certainly impact on South Essex authorities and is expected to have a wider effect extending into mid Essex along key transport corridors. Joint working between SEC and Chelmsford City should therefore occur to ensure that these implications and any opportunities arising are adequately reflected in the Chelmsford City Local Plan review.

I trust this response is of assistance to you in progressing the review of the Chelmsford Local Plan, and I look forward to discussing the matters raised above with you in due course.

Yours sincerely,

A solid black rectangular box used to redact a signature.

Assistant Director Climate and Growth

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

Civic Centre Duke Street  
Chelmsford Essex CM1 1JE

Please ask for: **Jeremy Potter**  
Telephone: [REDACTED]  
Date: 30 September 2024

**BY EMAIL ONLY**

Dear Ms Parrott

**Response to Chelmsford Local Plan Preferred Options Consultation Document**

Thank you for Castle Point Borough Council's consultation response to the above dated 19<sup>th</sup> June 2024.

Contained within your response you seek confirmation of Chelmsford City Council's position regarding accommodating any unmet housing need arising from Castle Point.

Chelmsford is at an advanced stage of reviewing its adopted Local Plan with the intention to publish its Pre-Submission Regulation 19 Local Plan by the end of January 2025. The evidence base supporting Chelmsford's Local Plan and its Spatial Strategy is based on our selected housing requirement of 1,000 net homes per year, plus a 20% supply buffer. The existing standard method for Chelmsford has averaged around 950 net homes per year.

As you will be aware, since your consultation response was sent, the incoming new Government has published for consultation significant changes to national planning policy. This includes changes to the application and formulation of the standard method for calculating housing need and changes to Green Belt policy. The application of the proposed new standard method for housing need in Chelmsford results in a 54% increase in our housing numbers. This creates the highest annual housing requirement for any LPA in Essex of 1,406 net new homes per year.

It is our intention to progress Chelmsford's Local Plan through the proposed transitional arrangements outlined in the Government's consultation to national planning policy. This results in almost all the housing supply buffer originally identified in Chelmsford's Preferred Options Local Plan being incorporated into meeting a revised Local Housing Need number required by the transitional arrangements i.e. the difference between the existing local housing need number and the proposed new standard method currently being 200 homes or less and progressing to Regulation 19 publication within a short period of the final NPPF being published.

Our Local Plan evidence base and Integrated Impact Assessment (IIA) have extensively tested our proposed Spatial Strategy to meet Chelmsford's development needs. As such there is no capacity in Chelmsford's proposed Spatial Strategy to accommodate any unmet housing need from neighbouring or nearby local authorities, including from Castle Point Borough Council.

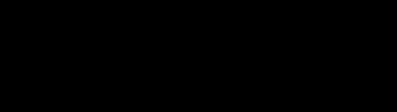
Notwithstanding the practical, procedural and technical matters outlined above, as already set out in responses to previous requests from Castle Point Borough Council to Chelmsford to help accommodate un-met housing need, there are limited demographic, economic and geographic links between the two council areas.

In addition, the request from Castle Point Borough Council is now considered premature ahead of the finalisation of the new NPPF. The consultation version of the NPPF states that meeting housing need is an exceptional circumstance to trigger the review of Green Belt boundaries and propose alterations to the Green Belt to meet these needs in full. If the changes remain in the NPPF, a full review of the Green Belt will be required to be undertaken in Castle Point to determine the level of housing that can be met within your boundaries. This is likely to be the same position for all South Essex LPAs and it would make sense that a Green Belt review was undertaken strategically across the whole of South Essex.

However, I do wish to confirm that we will continue to engage constructively with Castle Point Borough Council through the Duty-to-Cooperate process on this matter and others contained within your consultation response.

For your information, the contents of this letter have been formulated in consultation with the Director of Sustainable Communities and the Cabinet Member for a Greener Chelmsford.

Yours sincerely



Jeremy Potter  
Spatial Planning Services Manager



Climate and Growth  
Castle Point Borough  
Council  
Council Offices, Kiln Road,  
Thundersley, Benfleet  
Essex SS7 1TF  
Tel: 01268 882200

[planningpolicy@castlepoint.gov.uk](mailto:planningpolicy@castlepoint.gov.uk)

By email: [planning.policy@chelmsford.gov.uk](mailto:planning.policy@chelmsford.gov.uk)

10<sup>th</sup> March 2025

Dear Mr Potter,

### **Chelmsford Local Plan Pre-Submission (Regulation 19) Document**

I am writing on behalf of Castle Point Borough Council in response to the consultation underway on the Chelmsford Local Plan Pre-Submission (Regulation 19) Document.

Castlepoint supports Chelmsford City Council on their significant growth ambitions and particularly the emphasis placed on sustainability.

Within the consultation document we note there has been a significant emphasis on working closely with North and Central Essex on strategic matters, however we want to emphasise that strategic planning should not be limited to just those areas and should include South Essex too. We welcome the opportunity to work more closely with Chelmsford City Council to ensure that as a collective we are responding to the opportunity of future growth by planning positively for the area as a whole. Castlepoint and Chelmsford are linked by the A130 and therefore a joint up approach would only benefit both councils.

### ***Housing and Employment Growth***

We have reviewed the Pre-Submission Document and welcome your proposals around employment and housing growth. It is noted that you have now sought to balance housing growth with employment growth through the plan, and that you have given consideration to the impacts of growth in South East Chelmsford on the strategic highway network that connects into South Essex. We note that the proposals include a significant amount of growth in Growth Area 3 – South and East Chelmsford, of particular concern to us is the amount of growth proposed while there are existing capacity challenges at the junctions along the A130 and no infrastructure improvements are detailed to mitigate the impact this would have on the A130.

The publication of the NPPF in December 2024 lead to a large rise in housing requirements that a number of authorities across the country are grappling with how best to address. This document details that you are only proposing to meet 83% of the local housing need figure updated by the December NPPF publication. Given the opportunity for growth in your city Castle Point implores you to increase the housing provision contained within this plan to meet the housing need and look to go beyond this to help your neighbouring authorities.

You will recall that Castle Point Borough Council wrote to you in the summer of 2022, requesting that you consider whether it would be possible to accommodate any unmet need arising within Castle Point as part of the Chelmsford Local Plan. You replied that autumn indicating that you did not feel it would be possible to do so. We wrote again in the Summer of 2024 in response to your regulation 18 consultation to request whether you would be able to meet any of the unmet need within our Borough.

Since this time Castle Point has undertaken an extensive review of its urban capacity and has identified the potential to accommodate around 3,730 homes over a 20-year period. This figure has been arrived at by optimising capacity on brownfield sites and other sites in the existing urban area and includes extant consents and a windfall allowance. We are continuing work on how we can possibly optimise densities any further to increase this number however it has become clear due to the increased housing requirements set out within the NPPF published in December 2024 that we are unable to meet our housing requirements, calculated using the standard method, of 14,020 homes.

While the previous NPPF allowed for us to provide our locally assessed housing need of 5,100 homes over the same period, the revised changes have meant that we can no longer rely on this evidence.

As you will see, there remains a significant shortfall of the order of 10,290 homes. Unfortunately, due to the constrained nature of Castle Point it is unlikely that this shortfall compared to locally assessed housing need can be accommodated within the borough without incursion into the Green Belt. The NPPF is clear at paragraph 145 that the Green Belt should only be reviewed in exceptional circumstances and only once specific actions have been taken.

In accordance with paragraph 146 of the NPPF we have undertaken a Greenbelt Review and have unfortunately found that the review provides clear evidence that releasing enough greenbelt sites to meet our housing need would fundamentally undermine the purposes of the remaining Green Belt, when considered across the area of the plan.

As set out above we have and continue to thoroughly examine the urban capacity and the ability to optimise sites.

In accordance with paragraph 147 part C it is now necessary to ask again whether neighbouring authorities can accommodate some of the identified need for development.

As you will be aware our neighbours in South Essex are similarly constrained by the Green Belt and therefore it is appropriate to ask you to confirm the position of Chelmsford City Council at this time in respect of whether it is possible to accommodate any of the unmet need arising in Castle Point outside of the Green Belt.

### ***Cross Boundary Considerations***

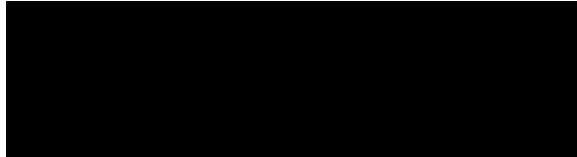
In respect of the previous consultation on the Chelmsford Local Plan Review we raised one cross boundary issues that have not been fully addressed in the Pre-Submission Document and which are repeated below.

**Sustainable connectivity with South Essex** – sustainable transport connectivity is poor between South Essex and Chelmsford. This is particularly the case for Castle Point which has no rail connectivity with Chelmsford and where it takes around 2 hours to get to Chelmsford

by bus. The consequence of this is a high proportion of movements being by car, and those who do not have a car being excluded from employment opportunities in Chelmsford. In the reverse this has a stifling effect on Chelmsford's economy. There is therefore a need for joint working between South Essex authorities through SEC, Chelmsford City Council and Essex County Council to improve sustainable travel connectivity north-south. This should be reflected in the Chelmsford City Local Plan Review.

I trust this response is of assistance to you in progressing the review of the Chelmsford Local Plan, and I look forward to discussing the matters raised above with you in due course.

Yours sincerely,



Genny Middlemast BSc (Hons) MSc MRTPI

Senior Planning Policy Officer



Climate & Growth  
Castle Point Borough Council,  
Council Offices, Kiln Road,  
Thundersley, Benfleet,  
Essex, SS7 1TF  
[www.castlepoint.gov.uk](http://www.castlepoint.gov.uk)

Kevin Waters  
Director of Growth and Planning  
Southend-on-Sea City Council  
Via email

Date: 30 January 2025

Dear Kevin,

### **Request for Assistance under the Duty to Cooperate**

I am writing to your authority under the Duty to Cooperate (DTC) to enquire whether it can assist Castle Point Borough Council in meeting its housing needs. A requirement of the DTC legislation is for planning authorities to engage constructively, with a view to finding solutions to address strategic matters which have cross boundary implications.

Castle Point is a small borough of just 17 square miles with an existing population density of 5,278 people per square mile.

Following consultation on the [Issues and Options Castle Point Plan](#) in Summer 2024, the Council were preparing a Plan to meet its identified local housing need of 5,100 homes (255 dpa) over the Plan Period to 2043. This figure being lower than the then government's Standard Methodology figure of 7,100 new homes (355 dpa) to 2043. The Local Housing Needs Assessment identified there were exceptional circumstances that justified a move away from the Standard Methodology due to the over estimation within the Standard Methodology regarding migration into the borough which had artificially inflated the overall housing requirement.

The government have now published a revised National Planning Policy Framework (NPPF) in December 2024, which changes the context for which the Castle Point Plan must be prepared. This removes the ability for Local Planning Authorities to set out exceptional circumstances to justify a different housing need than identified through the Standard Methodology. Therefore, the revised housing need for Castle Point is 14,020 new homes (701 dpa) to 2043.

As a result of this significant increase in housing need and removal of exceptional circumstances to justify a different housing need than set out in the Standard Method, the Council is reviewing the Castle Point Plan and undertaking further evidence to support the Plan such as a Green Belt Review, including identification of Grey Belt land. It is considered that the vast majority of the Green Belt in Castle Point fulfils a strong purpose, and there is

clear evidence that development in the Green Belt, including on some previously developed land within strategic gaps, may fundamentally undermine the function of the Green Belt.

The borough is heavily constrained by nature conservation constraints including the Benfleet and Southend Marshes Special Protection Area and Ramsar Site, six Sites of Special Scientific Interest, and swathes of land that are ancient woodland or priority habitat. Furthermore, the landscape provides the setting for Scheduled Monuments including Hadleigh Castle and a Roman roundhill. Approximately 50% of the borough's area is affected by tidal flood risk. This includes elements of the borough's area which sit outside the tidal defences.

To this end, Castle Point Borough Council is seeking to secure its growth within the existing urban areas by optimising urban land through regeneration and renewal. It is considered that through this approach we can meet our locally assessed housing need of 255 homes per annum or 5,100 homes over a 20-year period. It is not however possible to deliver housing growth substantially above this level without impacting on the fundamental purpose of the Green Belt, on nature conservation, on key heritage assets, or by increasing the risk from flooding.

We are therefore seeking your views on whether your authority can assist in any way to meeting our housing figure of 14,020 new homes.

Following publication of the NPPF in December 2024, the Council have revised the Local Development Scheme (LDS) which sets out the timetable for the Castle Point Plan. The [LDS](#) was approved on 29<sup>th</sup> January 2025. The timetable for the Castle Point Plan is summarised below:

- Regulation 19 Consultation – April to May 2025
- Submission – June 2025
- Examination – July 2025 to January 2026
- Adoption – April 2026

Due to this rapid timetable, I request a response by 21 February 2025. We would also like to offer the opportunity for you to meet with officers and discuss the evidence base to date and a further meeting once the additional evidence including the Green Belt Review and Site Assessments have concluded. Please let us know if you would like to meet with us.

If you require any assistance in terms of the matters raised in this letter, please do not hesitate to contact [planningpolicy@castlepoint.gov.uk](mailto:planningpolicy@castlepoint.gov.uk)

Yours faithfully,

**Amanda Parrott**  
*Assistant Director, Climate and Growth*

📍 Civic Centre, Victoria Avenue, Southend-on-Sea,  
Essex SS2 6ER  
📞 [REDACTED]  
🌐 [www.southend.gov.uk](http://www.southend.gov.uk)

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

Our ref: SCC/CPBC/DtC

Date: 3<sup>rd</sup> February 2025  
Telephone: [REDACTED]  
Email: [REDACTED]

Dear Amanda,

### **Response to request for Assistance under the Duty to Cooperate**

Thank you for your letter dated 30 January 2025, which sought views on whether Southend-on-Sea City Council is able to assist Castle Point Borough Council in any way to meet its housing figure of 14,020 homes (701 dwellings per annum) to 2043.

I also note your updated Local Development Scheme, which sets out a timetable for preparation of the Castle Point Plan, including Regulation 19 consultation in April to May 2025 and submission of the Local Plan for examination in June 2025.

As you are aware, Southend also has a number of physical constraints in addition to being predominantly built up in nature, with coastline to the south and east and a relatively small amount of undeveloped land to the north and west, forming part of the Metropolitan Green Belt.

Southend-on-Sea City Council intends to consult on a Regulation 18 draft local plan in Summer 2025, setting out a Preferred Approach. This will include draft policies and potential site allocations.

The Southend Local Plan evidence indicates that even if all the potential sites that have been promoted for development in Southend were to be carried forward as site allocations, Southend would be unable to meet its housing need in full using the Government's new Standard Method. This remains the case even if a sizeable windfall allowance could be demonstrated over the plan period.

Furthermore, we have previously requested through our recent consultation response to the Castle Point Borough Plan and following a Duty to Cooperate meeting in September 2021 as part of the preparation of the Southend Local Plan, if Castle Point are able to assist in meeting Southend's needs in relation to housing provision.

In view of the above, Southend is unable to make any contribution towards accommodating Castle Point's housing needs. However, we will of course continue to engage positively with you and neighbouring authorities as both respective local plans are progressed.

Yours sincerely

**Kevin Waters**  
Director of Planning and Economy



Climate & Growth  
Castle Point Borough Council,  
Council Offices, Kiln Road,  
Thundersley, Benfleet,  
Essex, SS7 1TF  
[www.castlepoint.gov.uk](http://www.castlepoint.gov.uk)

Ashley Baldwin  
Chief Planning Officer  
Thurrock Council  
Via email

Date: 30 January 2025

Dear Ashley,

### **Request for Assistance under the Duty to Cooperate**

I am writing to your authority under the Duty to Cooperate (DTC) to enquire whether it can assist Castle Point Borough Council in meeting its housing needs. A requirement of the DTC legislation is for planning authorities to engage constructively, with a view to finding solutions to address strategic matters which have cross boundary implications.

Castle Point is a small borough of just 17 square miles with an existing population density of 5,278 people per square mile.

Following consultation on the [Issues and Options Castle Point Plan](#) in Summer 2024, the Council were preparing a Plan to meet its identified local housing need of 5,100 homes (255 dpa) over the Plan Period to 2043. This figure being lower than the then government's Standard Methodology figure of 7,100 new homes (355 dpa) to 2043. The Local Housing Needs Assessment identified there were exceptional circumstances that justified a move away from the Standard Methodology due to the over estimation within the Standard Methodology regarding migration into the borough which had artificially inflated the overall housing requirement.

The government have now published a revised National Planning Policy Framework (NPPF) in December 2024, which changes the context for which the Castle Point Plan must be prepared. This removes the ability for Local Planning Authorities to set out exceptional circumstances to justify a different housing need than identified through the Standard Methodology. Therefore, the revised housing need for Castle Point is 14,020 new homes (701 dpa) to 2043.

As a result of this significant increase in housing need and removal of exceptional circumstances to justify a different housing need than set out in the Standard Method, the Council is reviewing the Castle Point Plan and undertaking further evidence to support the Plan such as a Green Belt Review, including identification of Grey Belt land. It is considered that the vast majority of the Green Belt in Castle Point fulfils a strong purpose, and there is

clear evidence that development in the Green Belt, including on some previously developed land within strategic gaps, may fundamentally undermine the function of the Green Belt.

The borough is heavily constrained by nature conservation constraints including the Benfleet and Southend Marshes Special Protection Area and Ramsar Site, six Sites of Special Scientific Interest, and swathes of land that are ancient woodland or priority habitat. Furthermore, the landscape provides the setting for Scheduled Monuments including Hadleigh Castle and a Roman roundhill. Approximately 50% of the borough's area is affected by tidal flood risk. This includes elements of the borough's area which sit outside the tidal defences.

To this end, Castle Point Borough Council is seeking to secure its growth within the existing urban areas by optimising urban land through regeneration and renewal. It is considered that through this approach we can meet our locally assessed housing need of 255 homes per annum or 5,100 homes over a 20-year period. It is not however possible to deliver housing growth substantially above this level without impacting on the fundamental purpose of the Green Belt, on nature conservation, on key heritage assets, or by increasing the risk from flooding.

We are therefore seeking your views on whether your authority can assist in any way to meeting our housing figure of 14,020 new homes.

Following publication of the NPPF in December 2024, the Council have revised the Local Development Scheme (LDS) which sets out the timetable for the Castle Point Plan. The [LDS](#) was approved on 29<sup>th</sup> January 2025. The timetable for the Castle Point Plan is summarised below:

- Regulation 19 Consultation – April to May 2025
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- Adoption – April 2026

Due to this rapid timetable, I request a response by 21 February 2025. We would also like to offer the opportunity for you to meet with officers and discuss the evidence base to date and a further meeting once the additional evidence including the Green Belt Review and Site Assessments have concluded. Please let us know if you would like to meet with us.

If you require any assistance in terms of the matters raised in this letter, please do not hesitate to contact [planningpolicy@castlepoint.gov.uk](mailto:planningpolicy@castlepoint.gov.uk)

Yours faithfully,

**Amanda Parrott**  
*Assistant Director, Climate and Growth*

20<sup>th</sup> February 2025

Amanda Parrot  
Assistant Director for Climate and Growth  
Castle Point Borough Council

[Cc: planningpolicy@castlepoint.gov.uk](mailto:planningpolicy@castlepoint.gov.uk)

& [REDACTED]

**DUTY TO COOPERATE FORMAL REQUEST FOR ASSISTANCE FROM CASTLE POINT UNDER SECTION 33A OF THE PLANNING AND COMPULSORY PURCHASE ACT (2004)**

Thankyou for your letter dated 30<sup>th</sup> January 2025 within which you make the formal request for Thurrock Council to consider whether any unmet housing need identified from Castle Point Borough Council could be met by Thurrock Council. It is noted that this request has been made by Castle Point Borough Council of all its neighbouring authorities as part of the preparation of the new Castle Point Local Plan and under the requirements of the Duty to Cooperate as set out in section 33A of the Planning and Compulsory Purchase Act (2004) from Section 110 of the Localism Act (2011). Thurrock Borough Council has carefully considered the Castle Point request and this letter should be regarded as the Thurrock Borough Council's formal response on the matter.

It is noted that Castle Point Borough Council (CPBC) issued an Issues and Options Castle Point Plan in Summer 2024 with a plan period to 2043. The housing figure contained within the CPBC was prepared under the old standard method and seeks to deliver a total of 5,100 new homes or 255 dwellings per annum. We acknowledge that under the latest changes to the National Planning Policy Framework (NPPF, 2024) that the government has now introduced a new housing stock methodology which has revised the homes target in CPBC to 14,020 homes or 701 new dwellings per annum.

As a neighbouring authority we appreciate the challenges the changes to the Standard Methodology are placing upon CPBC and the pressure this will place upon our adjoining communities together with the designated Green Belt and shared natural assets. However it is unclear from your Section 33a request the exact level of unmet need Castle Point is currently requesting to be met by adjoining authorities.

It is recognised that CPBC is at Regulation 18 stage and will be revisiting its evidence base particularly its Green Belt Review and the identification of Grey Belt land in preparation for issuing its Regulation 19 Draft for Consultation in April / May 2025. Thurrock Council would welcome further clarification on the following matters as part of CPBC's ongoing plan preparation:

1. The anticipated level of shortfall in housing supply compared to draft plan housing targets.
2. Whether any further evidence on housing site supply and capacity in urban area is being undertaken and whether any new sources of supply are being identified.
3. Any outcomes of the further refinement of the proposed housing options in the Green Belt as a source of housing supply.
4. The outcomes of further refinement of the proposed housing options within and adjoining constrained locations (eg flood risk, nature conservation, historic monuments).

The current development plan for Thurrock is the Core Strategy and Policies for Management of Development Local Plan (as amended 2015). Thurrock Council took the decision in February 2014 to commence work on a new local plan and has undertaken three stages of regulation 18 consultation with the first in 2016, the second in 2018 and most recently an Initial Proposal Document for consultation between December 2023 and February 2024.

The Council have now published a revised Local Development Scheme (September 2024) that sets out the next stages of the new Thurrock Local Plan. The timetable for release of the Regulation 19 Draft Consultation Plan is set for Spring 2026 with adoption anticipated in spring 2028. The new Thurrock Local Plan will also now cover the period upto 2044.

To provide evidence to support the next stages of the new Thurrock Local Plan the preparation of a range of technical studies are underway or being commissioned. A number of the emerging studies will update the housing need, development capacity and constraints to housing supply. These studies include a new Housing Need Assessment, a revised Housing Land Availability Assessment, a Green Belt review and an Economic Needs Assessment. The interim conclusion from ongoing work set out in the Regulation 18 Initial Proposal Consultation of 2023 is that the borough has a housing land supply including 7,300 dwellings in the urban area, existing commitments and windfall allowance which significantly falls short of the land supply required to meet Thurrock's own housing target.

Under the amended standard methodology (NPPF, December 2024) Thurrock is expected to deliver a minimum of 21,240 or 1,071 dwellings per annum which admittedly is below the previous Standard Method figure of 1,158 dwellings per annum. The Council will also have to consider the impact of the Freeport and other economic development on its housing need and is currently undertaking assessments of its projected economic needs over the plan period which is expected to give rise to greater pressure for housing delivery to support job creation. I would draw your attention to the Regulation 18 (Stage 3) Initial Proposals consultation ending in early 2024 (pre-Dec NPPF 2024 amendments to Standard Method) and the six strategic spatial options were housing growth ranged from 7,300 – 39,000.

The Council is seeking to accommodate its identified need within the borough boundary and this will present a significant challenge when balanced against other development and environmental considerations. At this stage it is not possible to

provide a definitive view on the capacity of the urban area but the implications of accommodating such a housing need figure within the borough are that the Council will need to consider significant Green Belt release to meet its own housing need. The Council has also commissioned a Stage 2 Green Belt review to inform the preparation of the new Local Plan and a new Urban Capacity study has already been completed.

Thurrock Council is still assessing whether the borough has the capacity to accommodate its own needs and it is not clear whether the Council has the capacity to meet the residual needs of any of the surrounding authorities. Moreover, at this stage Thurrock Council cannot be certain that it can accommodate its own housing need requirements and may need to request other authorities to assist.

Therefore, at this stage Thurrock Council is still assessing whether the borough has the capacity to accommodate its own housing needs and the Council is not in a position to confirm that it could accommodate any of CPBC unmet housing need. Thurrock Council has not fully delivered against its own housing targets in recent years and could not therefore be relied upon as a source of early housing for other local authorities.

Thurrock Council is happy to clarify further any matters set out in its response and would welcome further clarification on how Castle Point Borough Council intends to progress its local plan and evidence base and seeks to continue further engagement through the duty to cooperate on cross boundary matters.

Yours Faithfully

Ashley Baldwin  
Chief Planning Officer  
Planning Services  
Thurrock Borough Council