

## **Appendix 4: Statements of Common Ground**



**Statement of Common Ground**  
**Castle Point Plan 2026 to 2043**  
**Regulation 19 Pre-Submission Draft**  
**North West Thundersley Development Option**

Between

Castle Point Borough Council

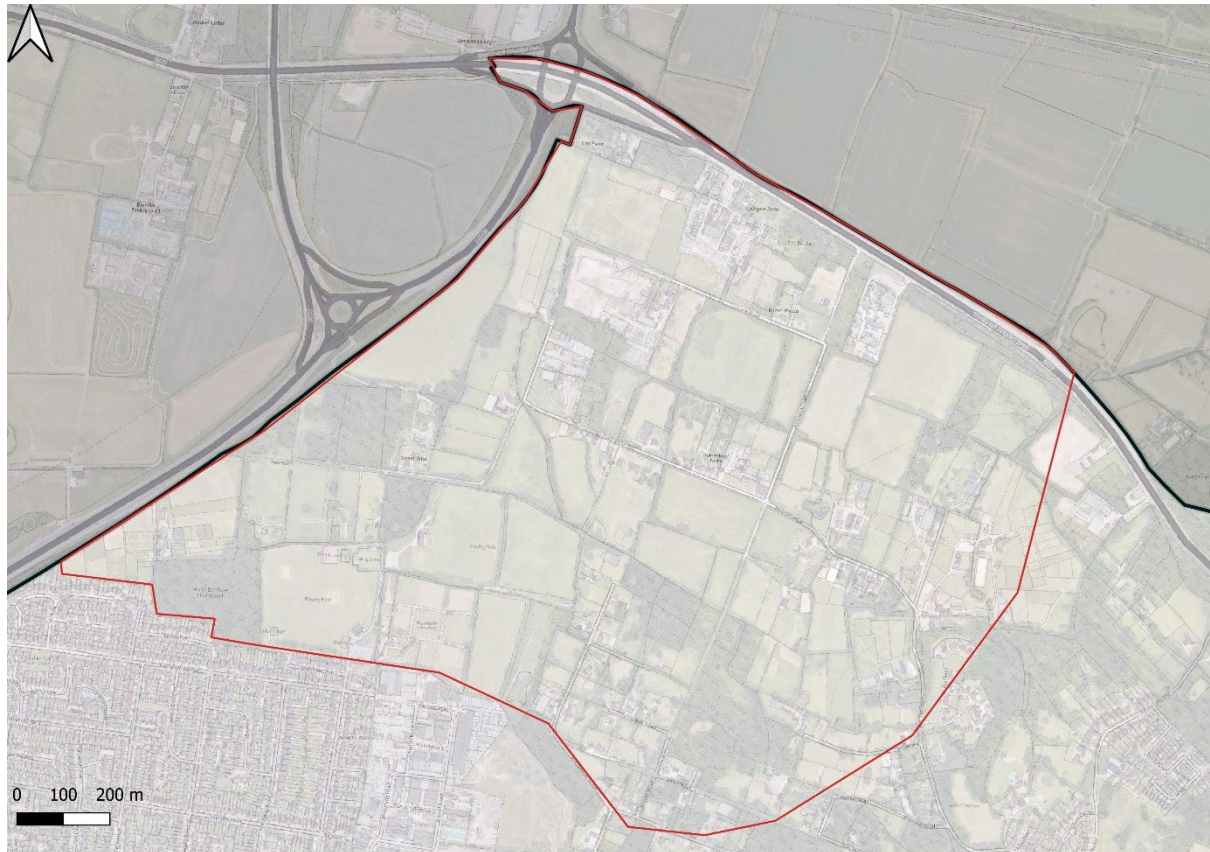
and

Essex County Council

August 2025

## 1. Introduction

- 1.1 This Statement of Common Ground (SoCG) identifies the areas of agreement between Castle Point Borough Council (CPBC) and Essex County Council (ECC) regarding the suitability of the site at North West Thundersley (NWT) as a potential development allocation in the emerging Castle Point Plan. The Castle Point Plan will cover the period up to 2043.



*Map 1 – Broad area of North West Thundersley*

## 2. Background

- 2.1 Parts of the land in North West Thundersley (NWT) were submitted under the call for sites held from 12 January 2024, to 12 February 2024 as requests from landowners for their consideration in the Castle Point Plan.
- 2.2 This led to the area being identified in the Issues and Options Consultation Report (Regulation 18) published in July 2024, as one of the areas of Green

Belt promoted for development if CPBC was mindful to reallocate Green Belt sites.

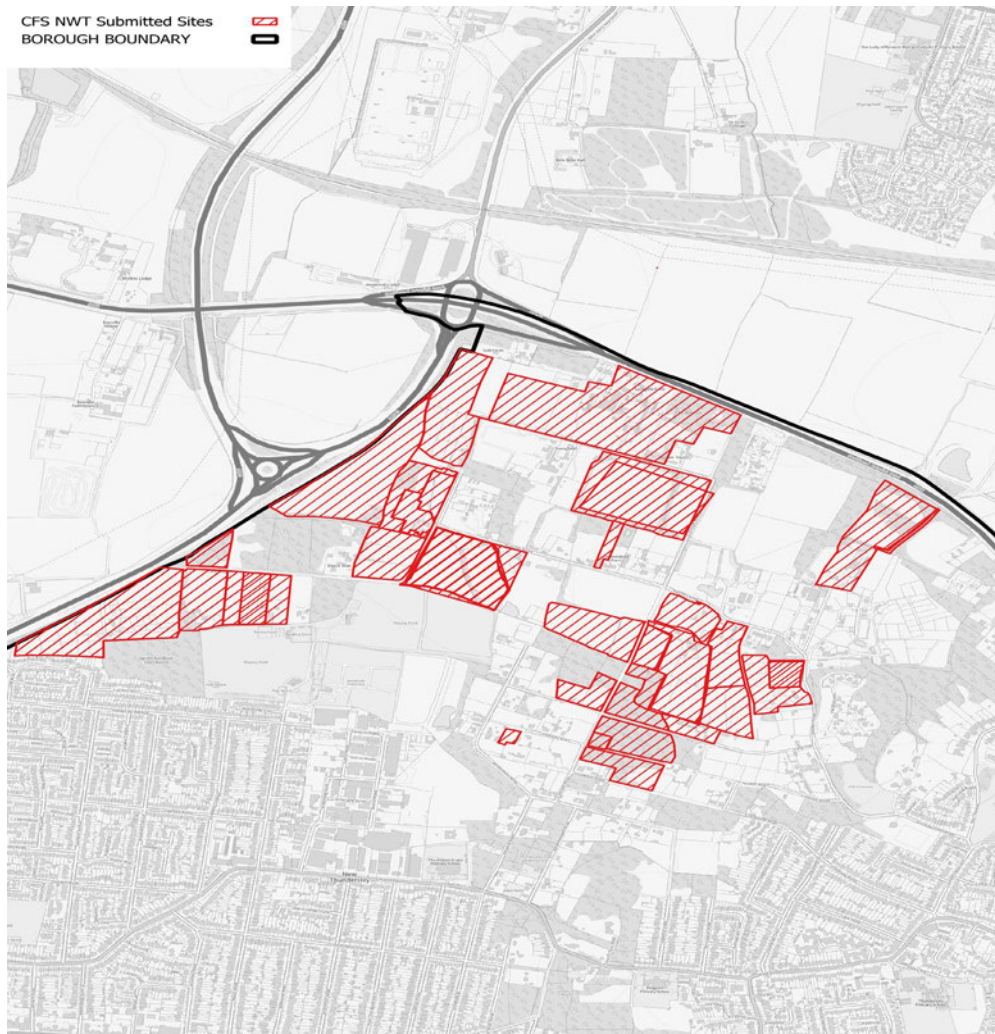
- 2.3 The area had previously been identified in the withdrawn Castle Point Local Plan 2019 to 2033 as a potential area for longer term growth and was not safeguarded. During the preparation of that plan, it was considered unlikely that the site would be deliverable during the plan period. This approach in that plan was consequently found to be sound by the Inspector.
- 2.4 As part of the preparation of the Castle Point Plan the site, together with other Green Belt sites has been assessed by CPBC using sustainability criteria as part of the Green Belt review.
- 2.5 Duty to Cooperate discussions have taken place between Castle Point Borough Council and Essex County Council and this Statement of Common Ground reflects those discussions and the conclusions reached.

### **3. Policy context**

- 3.1 Since the publication of the National Planning Policy Framework (NPPF) in December 2024, the context for which the Castle Point Plan must be prepared has significantly changed, particularly in relation to the mandatory requirement to identify housing need using the standard method (which has nearly doubled the housing target from 355 dpa to 686 dpa), the consequential need to positively consider development in the Green Belt if there is insufficient capacity in urban areas, and the introduction of the Grey Belt.
- 3.2 In response to this, CPBC has reviewed urban capacity — particularly densities — through its [Density and Capacity Study \(2025\)](#), which updates previous assessments in light of the revised NPPF and undertaken a [Green Belt Review](#) in accordance with the Green Belt Planning Practice Guidance.

#### 4. How the site was considered in the preparation of the Castle Point Plan

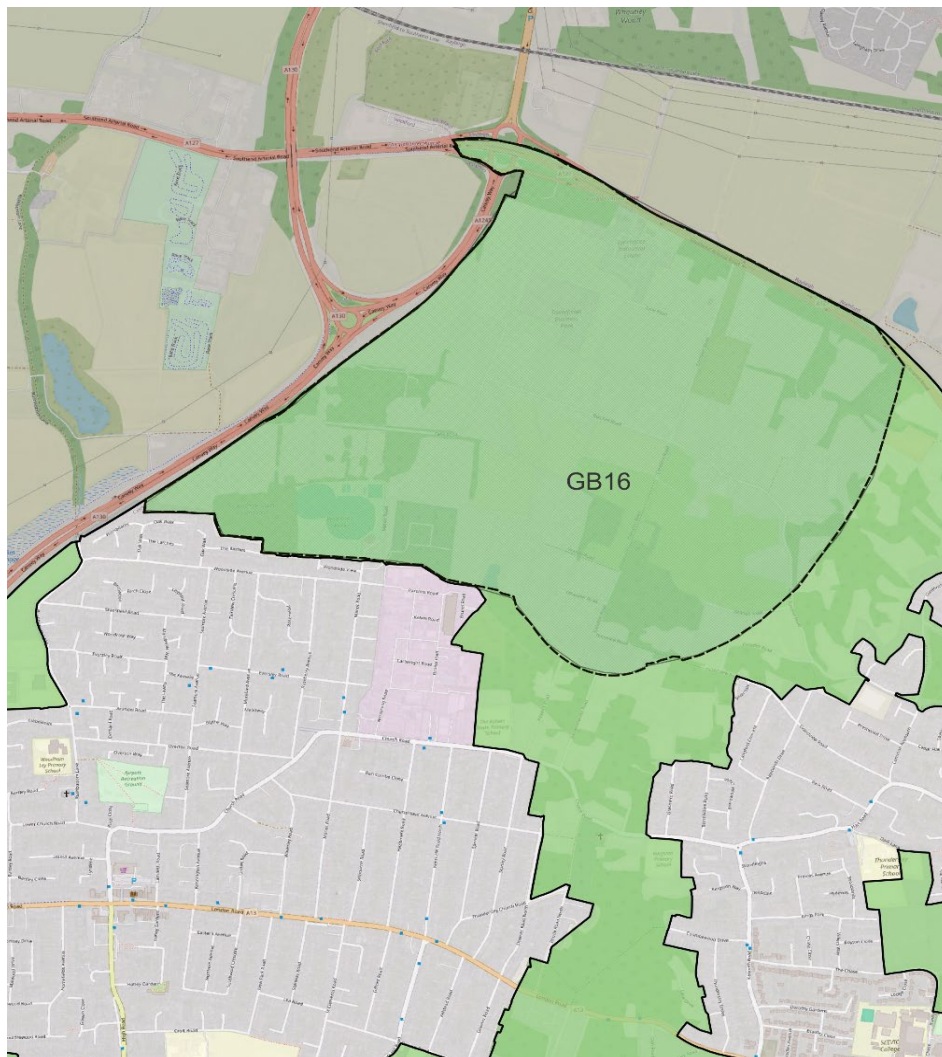
- 4.1 During the Call for Sites held in January and February 2024 landowners within the NWT area put forward sites for consideration – see Map 2 below.



*Map 2 – Call for Sites submissions locations*

- 4.2 These sites represent a significant proportion of NWT, and therefore, the Council presented NWT as a single option in the Issues and Options Consultation Document, July 2024 as shown on Map 3 below.





*Map 3 – Issues and Options Consultation - North West Thundersley Option*

- 4.3 The area comprises approximately 187 hectares, with landowner submissions covering a significant proportion. The Castle Point Strategic Land Availability Assessment (2025) identifies a theoretical capacity of between 5,624 and 9,373 dwellings, depending on assumed densities. The surrounding local roads lack the physical and operational capacity to support general vehicular access for strategic-scale development. These routes are constrained by their physical nature and existing traffic volumes. As a consequence of these constraints, access would need to be limited to active travel modes (walking and cycling) and public transport. Without potential access from the primary route network — namely the A127 or A130 — any future development would need to function as a self-contained settlement, with on-site provision of

essential services such as shops, employment space, education, and healthcare to meet day-to-day needs.

- 4.4 Both councils acknowledge that NWT was not deliverable during the previous plan period and it remains the case that it is not deliverable during the current plan period due to significant constraints including access to/from the strategic and local highway network via all modes, the need for its comprehensive development to deliver and fund the necessary infrastructure highway and community infrastructure, on-site environmental constraints, multiple land ownership and other planning concerns. It is anticipated that the costs and magnitude of the said required infrastructure would be both substantial and complex.

## **5. Strategic Considerations and Long-Term Planning Approach**

- 5.1 Both CPBC and ECC agree that any potential growth in NWT must be master planned in a comprehensive manner over the long-term requiring collaborative work, via the Duty to Co-operate, between CPBC, ECC, Basildon Borough Council, Rochford District Council and other South Essex Councils (SEC), given their proximity and shared infrastructure corridors, including the A127/A130 strategic network and Fairglen Interchange.
- 5.2 There are multiple land ownerships in NWT, which would require coordinated planning and infrastructure delivery. While it is recognised that large-scale developments — including new settlements — often involve complex land assembly or government support both CPBC and ECC agree that such mechanisms are not in place or sufficiently advanced to support delivery within the current plan period. The Castle Point Plan (Regulation 19) does not rely on NWT to meet its local need for housing as set out in the Local Housing Needs Assessment (2023) or wider spatial objectives. As such, no allocation is proposed, and any future consideration of the site should be pursued through a longer-term strategic planning process.

## **6 . Transport and Highway Constraints**

### A127/A130 Fairglen Interchange:

- 6.1 The interchange is of strategic importance and is already operating at or beyond capacity.
- 6.2 Permitted short-term improvements at the Fairglen Junction have secured the necessary funding with construction expected to commence in 2025 and cover a two year period, and is forecast to provide relief until at least 2036.
- 6.3 Future proposals will need to consider the housing and job growth requirements in current and future local plans cumulatively across South Essex.
- 6.4 The short-term improvements to the Fairglen Junction are not designed to accommodate the significant uplift in growth across South Essex, as identified in emerging Local Plans, but it is not prohibitive to the indicative requirements of a longer-term scheme, or other future proposals. However, there is no certainty on what level of development, residential and commercial, will take place in South Essex and how that will impact strategic junctions such as Fairglen and what longer terms improvements are needed to manage the increase in traffic from growth.
- 6.5 Therefore, this issue is better explored through the forthcoming strategic planning process.
- 6.6 Access to the strategic road network from North West Thundersley is severely constrained. Direct access onto the A127 is not feasible due to safety concerns, lack of available land for a new junction, and policy restrictions on new access points to strategic routes. Similarly, access onto the A130 including via the Rayleigh Spur Roundabout, or direct access points are not feasible due to safety, capacity, and policy limitations.



- 6.7 ECC did not formally object to the identification of NWT as a potential long-term growth location in the withdrawn Castle Point Local Plan (2018–2033). However, ECC’s current advice remains is not to allow additional access points onto the A127 and A130, both strategic routes, in the vicinity of the Fairglen Interchange for safety and capacity reasons as well as influencing the Lower Thames Crossing. This is to be kept under review but a direct access onto the Strategic Route (A127) is contrary to current Policy DM2 Strategic Routes/Main Distributors , as set out in [ECC Development Management Policies](#).
- 6.8 National Highways will be a key stakeholder as strategic movements via the Fairglen interchange are expected to increase once the consented Lower Thames Crossing is open to traffic in the early 2030’s.
- 6.9 It has been suggested that access to the site could be achieved via a left in, left out arrangement onto either the A127 or the A130. However, this is not considered an acceptable solution. Such arrangements would place additional pressure on the nearby strategic junctions — namely Fairglen and either Rayleigh Weir or Sadlers Farm — as vehicles would be reliant on these junctions to facilitate full access and egress movements. In addition, there is concern that LILO arrangements in this location would raise significant safety concerns.

#### Local Road Network Issues:

- 6.10 Increased development in NWT would exacerbate existing capacity issues at Tarpots (A13) and Woodman’s Arms (A129) junctions to the south and east. The Castle Point Local Plan Transport Assessment (2025) identifies both junctions as operating at or near capacity. Access onto these routes is therefore not considered feasible, as additional traffic would likely result in unacceptable congestion, queuing, and highway safety risks. Active and sustainable transport connectivity options into the existing urban area to the south require further investigation with regards their deliverability, design, feasibility and viability.

## **7. Green Belt and Environmental Constraints**

- 7.1 NWT is designated as Green Belt land, and both CPBC and ECC agree that it should remain so within the emerging plan period.
- 7.2 The site includes several playing fields and open spaces (e.g., Woodside Park and Benfleet Football Club) that serve important community functions and must be retained.
- 7.3 The area should be assessed as part of a Strategic or Cross Border Green Belt Review, which must fully consider the cumulative impact of any potential releases, particularly regarding the sustainability of the area and urban sprawl prevention. This is likely to be a key piece of evidence undertaken to inform the future Spatial Development Strategy for Greater Essex.
- 7.4 The Essex Local Nature Recovery Strategy identifies Strategic Opportunity Combined Areas for habitat creation, of which NWT has been identified as such and seeks to secure 20% biodiversity net gain in these areas.

## **8. Deliverability and Infrastructure Concerns**

- 8.1 ECC and CPBC maintain that the viability and deliverability of development at NWT requires significant infrastructure investment impacting upon its potential viability and deliverability, which would need to be evidenced including:
  - a. New local highway access and strategic and local junction improvements.
  - b. Pedestrian, cycling and public transport enhancements to integrate NWT with the existing urban area to the south and key destinations within and to wider South Essex.
  - c. Education and childcare, healthcare, SuDS and drainage infrastructure upgrades.
- 8.2 Any future development would be required to be at a sufficient scale to secure the developer funding for the necessary infrastructure and cannot place an unaffordable cost burden on the public purse.

- 8.3 Small-scale, piecemeal developments within NWT would not be of the scale to generate the sufficient developer contributions (S106/CIL) to fund necessary infrastructure or to enable proper place making. Therefore, a comprehensive, master-planned approach would be essential to deliver the scale of infrastructure required, and any future consideration of the site should be pursued through the longer-term strategic planning process.
- 8.4 A further critical infrastructure issue that must be addressed relates to energy. This area does not currently benefit from significant existing energy infrastructure, and substantial electricity network reinforcement will be required to support any future development. The absence of sufficient energy capacity presents a major deliverability challenge, and this must be fully factored into any assessment of the site's viability.
- 8.5 Without clear commitments and funding mechanisms, any development in NWT risks creating isolated and unsustainable communities.

## **9. Agreed Position**

- 9.1 Both councils agree that North West Thundersley (NWT) should not be allocated for development in the Castle Point Plan due to there being unresolved strategic matters preventing it being deliverable during the plan period. Key issues include, but are not exhaustive:
- 1) Strategic planning complexities requiring cross-boundary collaboration, particularly with planning authorities across South Essex. Any future consideration of the site should be pursued through the longer-term strategic planning process and the Spatial Development Strategy for Greater Essex.
  - 2) Significant highways and transportation constraints that cannot be easily mitigated, including direct access from the strategic network, namely the A127/A130; the strategic importance of the A127/A130 Fairglen interchange to wider South Essex; the need to safeguard land within the vicinity of the junction to secure any necessary future

transport improvements; and the connectivity by active and sustainable modes, to the existing urban area to the south and wider key destinations.

- 3) Green Belt and environmental protection considerations.
- 4) Unresolved viability and deliverability issues related to infrastructure provision, including multiple land ownerships.
- 5) The potential scale and pattern of growth at NWT should be informed by the specific infrastructure requirements and balanced to ensure there is the necessary scale of development to secure the developer funding for necessary infrastructure. This must not place an undue burden on the public purse.
- 6) A comprehensive master plan approach, based on Town and Country Planning Association's Garden Community principles for large scale developments will be necessary.
- 7) Any such development should also have regard to the Essex Local Nature Recovery Strategy and maximise biodiversity net gain on-site.
- 8) Both councils agree that NWT should only be considered for future development as part of a wider, evidence-based review in collaboration with other local authorities and key stakeholders, including the preparation of a detailed master plan.

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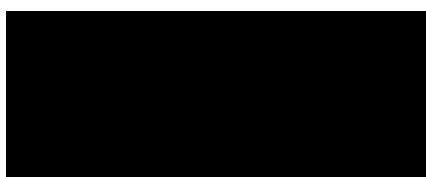
## **10. Conclusion**

- 10.1 The potential for growth in NWT is a long term joint strategic matter which will require collaborative working between ECC and CPBC, and cross boundary working with Basildon Borough, Rochford District and other South Essex Councils and is best considered as part of future strategic planning for Greater Essex
- 10.2 NWT is complex, in a multitude of land ownerships which will take a considerable time to address in order to inform its deliverability.

10.3 Any potential solutions are likely to be far reaching and so whilst this SoCG illustrates the collaborative approach between the authorities, it does not guarantee a resolution to the challenges presented within the emerging plan. Moreover this reaffirms a commitment in principle of partners to seek to address these issues outside of the current plan making process and the willingness to consider potential solutions as and when identified.

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**Signed:**



**Date:** 03/09/2025

For and on behalf of Castle Point Borough Council

**Name and Position:** Ian Butt – Director of Place and Communities

**Signed:**



**Date:** 12/09/2025

For and on behalf of Essex County Council

**Name and Position:** Graham Thomas Head of Planning & Sustainable Development

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# **Statement of Common Ground**

## **Castle Point Plan 2026 to 2043**

### **Regulation 19 Pre-Submission Draft**

Land East of Manor Trading Estate, Benfleet

Between

Castle Point Borough Council

and

Essex County Council

August 2025



## 1. Introduction and Purpose

- 1.1 This Statement of Common Ground identifies areas of agreement between Essex County Council (ECC) and Castle Point Borough Council (CPBC) regarding the Site: Land East of Manor Trading Estate, Benfleet ("the site"), which has been assessed for residential development through the Castle Point Plan.



## 2. The Site and its Surroundings

- 2.1 The site is an irregular area of land to the east of the Manor Trading Estate, located in the Green Belt. It has an area of approximately 6.8ha, with a watercourse running within the southern part of the site.
- 2.2 The site is cleared woodland, which is subject to a woodland restocking order issued by the Forestry Commission details of which are set out in paragraph 4.5.
- 2.3 Part of the site close to the northern portion of the Manor Trading Estate appears to have been used for outside storage from the adjoining businesses.
- 2.4 To the west, the site adjoins the Manor Trading Estate, a mixed-use development accessed from Church Road. It comprises a range of commercial, service sector, warehouse, and industrial processes, including a scrap metal merchants and low-rise light industry buildings along the western boundary.
- 2.5 To the north and east, the site is adjoined by a belt of trees, beyond which are detached and semi-detached dwellings in large plots and the wider Green Belt.

2.6 To the south, the site is bounded by the curtilage of the Heston Day Care Centre and the Robert Drake Primary School.

### **3. Background**

3.1 The landowner of this site submitted the site for consideration in the Castle Point Plan during the Call for Sites held from 12 January 2024 to 12 February 2024. Therefore, the site was included as an option site in the [Issues and Options Consultation Document \(Reg 18\)](#) in July 2024.

3.2 The site was previously identified for employment uses in the now withdrawn Castle Point Local Plan 2019-2033; However, the landowner objected to that proposed allocation, and submitted a representation and appeared at the hearings seeking that the site be allocated for residential development.

3.3 The Inspector into that plan disagreed with the landowner and also the Council in the need for employment land, and, therefore, the exceptional circumstances for this land being removed from the Green Belt. He concluded in paragraph 145 of the report: *'I am not convinced that exceptional circumstances for the alteration of the Green Belt boundary to accommodate the extension to the Manor Trading Estate, is adequately evidenced and justified.'* Therefore, the site was to be retained within the Green Belt, if that plan had been adopted.

3.4 The plan was not adopted, and subsequently withdrawn. Therefore, the site remains within the Green Belt as defined in the Castle Point Local Plan 1998.

### **4. Planning History and Appeal Decision**

4.1 A planning application (21/0532/OUT) for 68 residential units, three Class E units, one B2 unit, and two B8 units on Land East of Manor Trading Estate was refused, and an appeal was subsequently dismissed in May 2023 (APP/M1520/W/22/3310794).

4.2 The proposal included noise mitigation measures such as a 12m high noise barrier formed by industrial and commercial buildings, and a 2.4m high noise barrier within the proposed development itself. Noise modelling was provided to support the application.

4.3 However, in dismissing the appeal, the Inspector found (paragraph 56) that the noise impact from Manor Trading Estate, particularly Benfleet Scrap, would create a poor acoustic environment for much of the proposed residential development. This was deemed contrary to NPPF 130(f) (now NPPF 135(f)).

4.4 Furthermore, the Inspector's planning balance assessment (paragraph 85) concluded that:

- While noise mitigation could potentially improve parts of the external environment to an acceptable level under NPPF paragraph 185(a), it was not demonstrated that this could be achieved across a sufficient extent of the site to support 68 residential units as proposed.
- Harm to potential living conditions from noise in the external environment of the housing would not be clearly outweighed by considerations of housing and affordable housing need, even supplemented by the minor benefits to employment land supply, environmental improvements within the Manor Trading Estate, and biodiversity gain.

- 4.5 In addition, parts of the site are subject to a restocking notice from the Forest Commission following the unauthorised removal of trees without a felling licence. The restocking notice was dated 13 February 2023 and provided until 30 June 2024 to comply with the requirements of the notice and then for a 10 year period following restocking, to retain and maintain those trees. A subsequent enforcement notice for non-compliance with the restocking notice was issued on 26 March 2025 which gives until 26 June 2026 to comply with the restocking notice. Neither notice to date has been complied with.
- 4.6 The restocking and subsequent enforcement notices are issued under the Forestry Act which establishes a regulatory regime which operates in parallel with the Planning Acts. It is a well-established rule that one regulatory regime does not normally override another and that one regulatory regime should not be used to impose the requirements of a different regulatory regime or to second-guess its operation. A developer must comply with the requirements of all regulatory regimes relevant to the proposal. Therefore, if any planning applications or plans were submitted for this site, they will have to comply with the requirements of the restocking notice under the Forestry Act, as well as any requirements under the Planning Acts.

## **5. Policy context for the Castle Point Plan**

- 5.1 Following the publication of the National Planning Policy Framework (NPPF) in December 2024, the context in which the Castle Point Plan is being prepared has significantly changed, particularly regarding housing need and development within the Green Belt, including grey belt. As a result, a Green Belt Review has been undertaken by CPBC to assess potential grey belt sites across the Borough.
- 5.2 This Statement confirms the agreed position that residential development for this site is not supported.

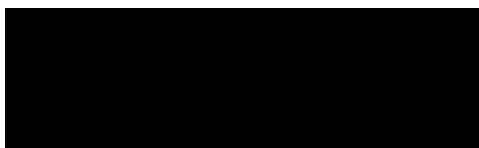
## **6. Neighbouring Uses and Impacts**

- 6.1 Adjacent to the site is Benfleet Scrap, a key facility for the reuse, recycling, and recovery of waste metal. Benfleet Scrap is a safeguarded site under the Essex and Southend-on-Sea Waste Local Plan 2017, which forms part of the Development Plan for this area. Therefore, ECC, as the Waste and Minerals Planning Authority, and CPBC have a responsibility to ensure that such facilities remain viable and are not compromised by incompatible neighbouring uses.
- 6.2 In response to the Castle Point Plan Issues and Options Consultation (Summer 2024), ECC has maintained that existing employment sites featuring 'sui generis' operations should be supported and safeguarded for compatible employment activities, rather than being allocated for residential development. Residential uses are considered "bad neighbour" developments that could impinge on the viability of lawful employment uses, particularly general industrial and 'sui generis' operations such as waste management.
- 6.3 Policy 2 (Waste Consultation Areas) of the Waste Local Plan, which forms part of the Development Plan for the Borough, require that waste operations must not be adversely affected by new development. Also the "Agent of Change" principle set out in the 2024 NPPF at Paragraph 200 requires, *'Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.'*

## 7. Conclusion

- 7.1 The site is not considered suitable for residential development due to its proximity to incompatible existing uses and its potential impact on safeguarded employment sites.
- 7.2 Taking all of the above into account, CPBC and ECC agree that the principle of residential development at the site Land East of Manor Trading Estate, Benfleet, is therefore at present not supported.
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**Signed:**

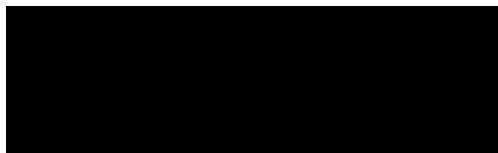


For and on behalf of Castle Point Borough Council:

**Name and Position:** Ian Butt – Director of Place and Communities

**Date:** 16/09/2025

**Signed:**



For and on behalf of Essex County Council:

**Name and Position:** Graham Thomas - Head of Planning & Sustainable Development

**Date:** 29 September 2025

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**Statement of Common Ground**  
**Castle Point Plan 2026 to 2043**  
**Regulation 19 Draft**

Between

Castle Point Borough Council

and

Sport England

November 2025

## **1. Introduction**

- 1.1 This Statement of Common Ground (SoCG) has been prepared jointly by Castle Point Borough Council (CPBC) and Sport England in relation to the Castle Point Local Plan (known as the Castle Point Plan).
- 1.2 The purpose of this SoCG is to set out the areas of agreement and any outstanding matters between the parties, in accordance with the requirements of the National Planning Policy Framework (NPPF, paragraph 28) and the Planning Practice Guidance.
- 1.3 As part of the evidence base to support the Castle Point Plan, an update to the Playing Pitch Strategy 2018 and Open Space Assessment 2023 and Built Facilities Needs Assessment and Strategy 2018, is underway. These updates have informed the policies and allocations relevant to sport and recreation within the Castle Point Plan. Sport England have been a key stakeholder through the development of these updated studies. This work is due for completion in early 2026.
- 1.4 Throughout the development of the Castle Point Plan, CPBC and Sport England have engaged regularly with regards its role as statutory consultee.
- 1.5 In accordance with the Town and Country Planning (Local Planning)(England) Regulations 2012, Sport England has been formally consulted at Regulation 18 and 19 stage of consultation and early drafts of policies prior to public consultation have been shared with Sport England.
- 1.6 This SoCG identifies the matters on which CPBC and Sport England are agreed, as well as any areas where differences remain.



## **2. Strategic Matters**

2.1 This section identifies the strategic matters relevant to both CPBC and Sport England in the context of the Castle Point Plan.

2.2 The following strategic matters are recognised by both parties:

- Protection of existing sports facilities and open space
- Provision of new and enhanced facilities to support growth
- Promoting active lifestyles and access to high-quality sport and recreation facilities is a strategic objective of both Sport England and CPBC.

2.3 CPBC and Sport England acknowledge and agree that they share a mutual commitment to the objectives of Sport England's Place Partnership programme, which was expanded in November 2023 to invest in local communities most in need, ensuring they can access sport and physical activity. As one of the 80 new designated places across England, and one of three in Essex, CPBC will work collaboratively with Sport England to create the conditions for change at a local level. This partnership will deliver impact by decreasing inactivity, increasing activity, providing positive experiences for children and young people, and tackling inequalities that prevent participation.

### 3. Areas of Agreement (Common Ground)

3.1 Sport England submitted representations to the Castle Point Plan during the Regulation 19 Draft Consultation (1 August to 26 September 2025) on 5 August 2025 and confirmed their position during the further consultation on the 30 October 2025.

3.2 Sport England support the direction and aim of several policies and principles, as follows:

Vision	Support is offered for the proposed vision in terms of green spaces, community buildings and other community spaces delivering health and wellbeing outcomes
Objectives	Objectives 2, 3, 17 and 19 are supported as these objectives would support the provision of opportunities for sport/physical activity and encourage active environments.
Policy SP1 – Supporting Enhancements of the Borough’s Green Spaces	The policy is supported due to its focus on protecting and enhancing the Borough’s green and blue infrastructure to support health and wellbeing including physical activity.
Policy SP3 – Meeting Development Needs	The policy is supported, especially part 3 because the requirements would support the creation of active environments that would encourage physical activity through the planning and design of development
Policy SP4 – Development Contributions	The policy is supported as it would help ensure that infrastructure requirements arising from development including facilities that support community sport and physical activity are provided to meet the additional demands created by new developments. The specific reference in paragraph 6.62 of the reasoned justification to sports facilities as a type of infrastructure that is needed is welcomed in this context

Policy B9 – South Benfleet Playing Fields	The principle of masterplanning South Benfleet Playing Fields as a multi-functional green space is welcomed as this would encourage sport and physical activity to take place. Criterion 5 is particularly welcomed as it will help ensure that the existing playing pitches which make an important contribution to its multi-functional role are not lost or prejudiced by future proposals
Policy Had4 – Land South of Scrub Lane	Land south of Scrub Lane (Ref: 318) was land last used as a playing field albeit many years ago. The site was allocated in the previous Local Plan that was not adopted. Sport England's position on this allocation when consulted in the past was that based on the individual circumstances of the site (including the limited size of the site and the lack of ancillary facility infrastructure) the principle of development would be acceptable if mitigation could be secured in the form of an appropriate financial contribution in lieu of direct replacement playing field provision that could be used towards new or enhanced playing field provision in the Borough. This is justified due to the deficiencies identified in the Council's Playing Pitch Strategy as the site could be brought back into use to help address these deficiencies. The requirement in part 5 of the policy (and paragraph 10.30 of the reasoned justification) for the loss of playing field land to be mitigated by an appropriate financial contribution towards new or enhanced playing fields nearby is therefore supported
Policy Thun2 – Kiln Road Campus	The site contains strategically important community sports facilities that serve the Thundersley, Benfleet and Hadleigh areas of the Borough namely the Runnymede Leisure Centre and USP College. The requirement in part 1 of the policy (and paragraph 11.12 of the reasoned justification) re-provide the community uses with equivalent or better provision either on-site or off-site is welcomed as this should ensure that any future proposals that require the redevelopment of these facilities will make provision for their replacement
Policy Infra4 – Open Spaces	The policy is supported (especially part 2 and 4) as it supports the protection of open space including playing pitches unless suitable criteria are met

Policy Infra5 – Sports Provision	The policy and its reasoned justification are supported as it supports the protection of indoor sports facilities and securing provision for additional or enhanced indoor sports facilities and outdoor sports facilities/playing pitches in new development
Policy T1 – Transport Strategy	The policy is supported due to its focus on supporting sustainable and active travel modes which will encourage physical activity. In particular, part 2 of the policy (and paragraph 20.10 of the reasoned justification) is supported as this requires new development to be designed using active design principles so that people can walk, cycle and wheel in their local area with ease
Policy T3 – Active Travel Improvements	The policy is supported due to its focus on measures that will support active travel improvements which will encourage physical activity. In particular, part 5 of the policy is supported as this would support active travel routes through public open spaces which would provide opportunities for people to be active when they are travelling to open spaces where they will participate in physical activity

3.3 The entries in the table below sets out the agreed modifications to the Castle Point Plan, which resolve all Sport England’s representations. All modifications in this SoCG are also included in the Council’s Modifications Schedule.

Rep Number	Policy / Para ref	Sport England Reg 19 Position	Agreed position between CPBC and Sport England
0738	D1 – Design Objectives	<p>In view the Local Plan’s vision and strategic objectives relating to delivering health and wellbeing outcomes to enable more active and healthier lifestyles for residents, it is surprising that a design objective does not encourage development to be designed to encourage physical activity. While reference to Sport England’s Active Design is made later in the plan in paragraph 16.34 of the reasoned justification to Policy D2, there is no specific objective in the design principles policy. As well as positively responding to the Local Plan’s vision and objectives, the inclusion of an additional objective to address this matter would allow the policy to be consistent with paragraphs 96(c and 129(e of the NPPF as well as the Active Design guidance.</p> <p>An objection is therefore made to the Local Plan in its current form as it would not be considered to meet the ‘positively prepared’ or ‘consistent with national policy’ tests of soundness.</p> <p>To address this, it is requested that an additional design objective is included in Policy D1 along the following lines:</p> <p>“Maximise opportunities for encouraging physical activity”</p> <p>It is also requested that the reasoned justification then provides a short explanation of the importance of</p>	<p><u>Modification to Policy D1</u></p> <p><b>p. Maximise opportunities for encouraging physical activity.</b></p> <p><u>Modification to paragraph 16.28</u></p> <p>Developments have the potential to improve accessibility and local permeability by making places that connect with each other and are easy to move through. <b>This also encourages the use of active travel and encourages physical activity.</b> Promoting legibility through development helps to provide recognisable routes, intersections and landmarks to help people find their way around; and make faster journeys. <b>Sport England have also developed ‘<u>ten principles to inform active design</u>’ which provide guidance on how the design of environments can help people lead more physically active and healthy lives.</b></p>

Rep Number	Policy / Para ref	Sport England Reg 19 Position	Agreed position between CPBC and Sport England
		designing developments to encourage physical activity and that Sport England's Active Design guidance is signposted to for detailed advice on how this can be achieved in practice.	
0738	Infra3 – Improving Health and Wellbeing	<p>In view the Local Plan's vision and strategic objectives relating to delivering health and wellbeing outcomes to enable more active and healthier lifestyles for residents, it is surprising that the policy does not go beyond the focus on providing conventional health infrastructure and also cover preventative health measures. In particular, a health and wellbeing policy in a Local Plan would be expected to require developments to be planned and designed to support physical activity and thereby encourage healthy lifestyles. As well as positively responding to the Local Plan's vision and objectives, the inclusion of an additional requirement to address this matter would allow the policy to be consistent with paragraphs 96(c) and 129(e) of the NPPF.</p> <p>An objection is therefore made to the policy in its current form as it would not be considered to meet the 'positively prepared' or 'consistent with national policy' tests of soundness.</p> <p>To address this, it is requested that an additional requirement is included in Policy Infra3 along the following lines:</p>	<p><u>Modification to Policy Infra3 (to be inserted as f. and subsequent renumbering)</u></p> <p><b>f. Expecting all development proposals to be planned and designed to encourage more active and healthier lifestyles;</b></p> <p><u>New paragraph to be added to Reasoned Justification</u></p> <p><b>Designing developments to promote active and healthier lifestyles is central to creating sustainable communities. Incorporating walking, cycling, green spaces, and accessible sports facilities encourages daily activity, supports wellbeing, and reduces car dependency. Development proposals should have regard to the <a href="#">Sport England Active Design Guidance</a>.</b></p>



Rep Number	Policy / Para ref	Sport England Reg 19 Position	Agreed position between CPBC and Sport England
		<p>“Expecting developments to be planned and designed to encourage more active and healthier lifestyles”</p> <p>It is also requested that the reasoned justification then provides a short explanation of the importance of planning and designing developments to encourage more active and healthier lifestyles. Sport England’s Active Design guidance can be signposted to for detailed advice on how this can be achieved in practice.</p>	

#### **4. Areas Without Agreement (Uncommon Ground)**

4.1 There are no areas without agreement.

#### **5. Ongoing Cooperation**

5.1 CPBC will continue to engage with Sport England in their role as a statutory consultee for plan making and planning applications.

5.2 Collaboration will continue through the ongoing work to update the Playing Pitch Strategy 2018 and Open Space Assessment 2023 and Built Facilities Needs Assessment and Strategy 2018.

5.3 CPBC and Sport England will also continue to work collaboratively with the Active Essex Place Partnership.

## Signatories



For and on behalf of Castle Point Borough Council:

**Name and Position:** Amanda Parrott, Assistant Director, Climate and Growth

**Date:** 1 December 2025



For and on behalf of : Sport England

**Name and Position:** Roy Warren, Planning Manager

**Date:** 28<sup>th</sup> November 2025





# **Statement of Common Ground**

## **Castle Point Plan 2026 to 2043**

### **Regulation 19 Draft**

Between

Castle Point Borough Council

and

NHS Property Services

November 2025

## **1. Introduction**

- 1.1 This Statement of Common Ground (SoCG) has been prepared jointly by Castle Point Borough Council (CPBC) and NHS Property Services in relation to the Castle Point Local Plan (known as the Castle Point Plan).
- 1.2 The purpose of this SoCG is to set out the areas of agreement and any outstanding matters between the parties, in accordance with the requirements of the National Planning Policy Framework (NPPF, paragraph 28) and the Planning Practice Guidance.
- 1.3 CPBC has fully engaged with NHS Property Services on the development of the Castle Point Plan from the outset with regards its role as statutory consultee.
- 1.4 In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, NHS Property Services has been formally consulted at Regulation 18 and 19 stages of consultation.
- 1.5 This SoCG identifies the matters on which CPBC and NHS Property Services are agreed, as well as any areas where differences remain.

## **2. Strategic Matters**

- 2.1 NHS property and CPBC agree and work collaboratively on Local Plan policies Had3 Hadleigh Clinic and Thun3a Thundersley Clinic.

## **3. Areas of Agreement (Common Ground)**

- 3.1 NHS Property Services submitted representations to the Castle Point Plan during the Regulation 19 Draft Consultation (August to September 2025) on 10<sup>th</sup> October 2025, having agreed a short extension of time. The NHS Property Services confirmed their position during the further consultation (October to December 2025) on 11<sup>th</sup> November 2025.
- 3.2 NHS Property Services and CPBC have agreed support and understanding in relation to several policies and principles, as follows:
- General principle: The importance of health infrastructure to support housing growth.
  - Policy Infra3: Improving Health and Wellbeing
  - Policy SD4: Net Zero Carbon Development (In Operation)
  - Site Allocations Had 3: Hadleigh Clinic
  - Site Allocation Thun 3A: Thundersley Clinic
  - Evidence Base: Castle Point Plan Viability Study

3.3 The entries in the table below set out the agreed modifications to the Castle Point Plan, which resolve all NHS Property Services representations. All modifications in this SoCG are also included in the Council's Modifications Schedule.



Rep Number	Policy/Paragraph Reference	Summary of Representation/comment from NHS Property Services	Agreed response and modifications
0353	Policy SP4: Development Contributions and Policy Infra 3: Improving Health and Wellbeing	<p>Draft Strategic Policy SP4 states that, where necessary, new developments will be required to provide for the necessary on-site or off-site infrastructure requirements arising from the proposal, including improvements and expansions of healthcare facilities in reference to the IDP (Supporting Paragraph 6.62). Policy Infra3 particularly concerns seeking planning obligations or CIL to mitigate impacts of new developments on health provision.</p> <p>As drafted Strategic Policy SP4 does not sufficiently reflect the engagement process required when assessing the likely level of healthcare infrastructure required to support the level of growth proposed by the plan. Supporting paragraph 6.64 stipulates the Council's consideration of the ECC Developers' Guide to Infrastructure Contributions, and we also note the published Healthcare Facilities Developer Contributions Guidance SPD (2023). Whilst both documents set out the process/methodology adopted to determine the type of contributions, the required level of engagement with the Integrated Care Board (ICB) as local health commissioners should be made clear within Strategic Policy SP4, in line with Policy Infra3.</p> <p>For purposes of consistency across the Local Plan, we recommend the Council make clear reference to Policy Infra3 in seeking contributions for healthcare infrastructure, making clear reference unto the engagement required with the NHS and in particular, the ICB. Healthcare providers should have flexibility in determining the most appropriate means of meeting the relevant healthcare needs arising from a new development, and should therefore be engaged with at the earliest stages possible.</p>	<p>Policy SP4, is a high level strategic policy, and the importance of working in partnership with the NHS regarding specific health related infrastructure is covered elsewhere in Policy Infra3.</p> <p>NPPF paragraph 16 notes that Plans should avoid unnecessary duplication. It is considered implicit in Policy Infra3 that the council will work 'in partnership with the NHS and Public Health' (paragraph a); that contributions will be sought to new or enhanced health facilities (paragraph b); that Health Impact Assessments should be undertaken 'at an early stage' (paragraph i); and agreed with 'public health professionals prior to commencement of the assessment at the earliest opportunity' (paragraph h).</p>

Rep Number	Policy/Paragraph Reference	Summary of Representation/comment from NHS Property Services	Agreed response and modifications
0353	Policy Infra1: Community Facilities	<p>Draft Policy Infra1 focuses on the provision of new and improvement of existing community facilities. Point 4 in particular sets out the requirements to be demonstrated where the development would result in the loss of a community facility. NHSPS welcomes the included wording under Point 4 (a), in line with our previous representation at early Regulation 18 stage (2024).</p> <p>For the avoidance of doubt in the interpretation of Policy Infra1 Point 4, we would request the Council to provide clarity in supporting paragraphs in reference to the disposal process of healthcare facilities. Where healthcare facilities are demonstrated as being surplus to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, we request that it is clarified and ensured that this will sufficiently satisfy the requirements under Point 4 (a) of the policy.</p>	<p>Policy element 4 states that ‘a. An assessment has been undertaken which demonstrates that the existing facility is surplus to requirement;’ would justify the loss of a facility.</p> <p><u>New paragraph 19.13</u></p> <p><b>The loss of any community facilities must be fully justified. The Local Planning Authority will require any application involving the loss of a facility to be supported by written evidence and applicants should contact the Local Planning Authority at the earliest stage to discuss the details.</b></p>

#### **4. Areas Without Agreement (Uncommon Ground)**

4.1 There are no areas without agreement.

#### **5. Ongoing Cooperation**

5.1 CPBC will continue to engage with NHS Property Services throughout the examination of the Castle Point Plan and through their role as statutory consultee for plan making and planning applications.

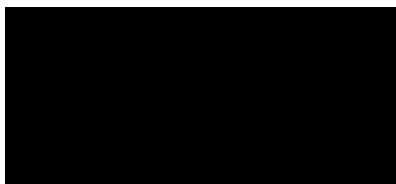
## Signatories



For and on behalf of Castle Point Borough Council:

**Name and Position:** Amanda Parrott, Assistant Director, Climate and Growth

**Date:** 25 November 2025



For and on behalf of NHS Property Services:

**Name and Position:** Hyacinth Cabiles MRTPI (Town Planner)

**Date:** 20/11/2025



# **Statement of Common Ground**

## **Castle Point Plan 2026 to 2043**

### **Regulation 19 Draft**

Between

Castle Point Borough Council

and

Anglian Water

November 2025

## **1. Introduction**

- 1.1 This Statement of Common Ground (SoCG) has been prepared jointly by Castle Point Borough Council (CPBC) and Anglian Water in relation to the Castle Point Local Plan (known as the Castle Point Plan).
- 1.2 The purpose of this SoCG is to set out the areas of agreement and any outstanding matters between the parties, in accordance with the requirements of the National Planning Policy Framework (NPPF, paragraph 28) and the Planning Practice Guidance.
- 1.3 CPBC has fully engaged with Anglian Water on the development of the Castle Point Plan from the outset with regards its role as statutory consultee.
- 1.4 In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, Anglian Water has been formally consulted at Regulation 18 and 19 stages of consultation.
- 1.5 This SoCG identifies the matters on which CPBC and Anglian Water are agreed, as well as any areas where differences remain.

## **2. Strategic Matters**

- 2.1 Anglian Water and CPBC agree and work collaboratively on Local Plan policies C1, C4, C6, SD1, SD2, SD3, SD6 and SD9.

## **3. Areas of Agreement (Common Ground)**

- 3.1 Anglian Water submitted representations to the Castle Point Plan during the Regulation 19 Draft Consultation (1<sup>st</sup> August to 26<sup>th</sup> September 2025) on 26<sup>th</sup> September 2025. Anglian Water confirmed their position during the further consultation (October to December 2025) on 28<sup>th</sup> October 2025.
- 3.2 Anglian Water welcomes the overall content and vision of the Local Plan and commend the Council on reaching this detailed stage of development. Both authorities acknowledge the importance of water resources, supply and demand forecasting and water efficiency and look forward to future engagement as the Castle Point Plan progresses.
- 3.3 Anglian Water and CPBC have agreed support and understanding in relation to several policies and principles, as follows:

Policy SP1 – Supporting Enhancement of the Borough’s Green Spaces	<p>Anglian Water supports the policy requirements regarding new opportunities for green and blue infrastructure (GBI) and the multi-functional benefits well designed GBI can bring to existing and new communities, particularly in terms of climate resilience and minimising the impacts of pollution - including improved water quality.</p> <p>Anglian Water have completed successful trials in partnership with Essex County Council, installing “rain gardens” SuDS help reduce the risk of flooding. In addition, Anglian Water has delivered a new mycelium wetland at Benfleet water recycling centre (WRC), in partnership with the University of Essex who will be monitoring the performance of this innovative wetland design.</p> <p>Anglian Water therefore endorse the creation of GBI either retrofitting in existing communities as part of redevelopment and urban regeneration opportunities and creating GBI in new developments.</p>
Policy SP4 - Development Contributions	<p>Anglian Water supports the policy requirement to demonstrate that there is sufficient appropriate infrastructure capacity to support development proposals, and that this capacity will be sustainable in both physical and financial terms. It is considered that this policy is consistent with Policy SD9 in terms of the need for proposals to demonstrate there is adequate foul water treatment and drainage infrastructure to serve the development.</p>

3.4 The entries in the table below sets out the agreed modifications to the Castle Point Plan, which resolve all Anglian Water representations. All modifications in this SoCG are also included in the Council’s Modifications Schedule.


Rep Num ber	Policy/Par agraph Reference	Summary of Representation/comment from Anglian Water	Agreed response and modifications
1013	Policy C1 - Canvey Town Centre	<p>Anglian Water supports the policy requirements, and considers the policy sound in principle, regarding town centre greening and managing flood risk through urban greening, water capture schemes and appropriate use of materials. Anglian Water has been involved in partnership schemes to retrofit SuDS in Canvey to address surface water flood risk in the town, and therefore we consider that future growth and redevelopment of sites in the town should include appropriate SuDS through urban greening to provide overall betterment for the existing community. These types of schemes can provide additional opportunities for regeneration including enhanced public realm, positive health and wellbeing benefits, improving biodiversity and air quality.</p> <p>Anglian Water would welcome engagement in the preparation of the Canvey Town Centre Master Plan to assist with the appropriate management of surface water, following the drainage hierarchy.</p>	<p>Policy SD3 requires all new development to incorporate water management measures to reduce surface water run-off or adverse impact on water quality and ensure that it does not increase flood risk elsewhere. Policy SD3 also states that the principal method to do so should be the use of Sustainable Drainage Systems (SuDS). Supporting paragraph 21.37 states that 'Well-designed SuDS can contribute significantly towards the urban greening factor requirements set out in policy ENV3 SuDS can also contribute to climate change adaption and water efficiency, through provision of rainwater harvesting to assist in water capture to reducing risk of flooding and reduce water demand'.</p> <p>Policy C1 part 11 notes that the new Canvey Town Centre Master Plan will identify 'Opportunities for managing flood risk through greening, water capture schemes and the appropriate use of</p>



Rep Number	Policy/Paragraph Reference	Summary of Representation/comment from Anglian Water	Agreed response and modifications
			<p>materials.’ This could be further amended as follows:</p> <p><u>Policy C1 - Canvey Town Centre Amendment to Part 11</u></p> <p><b>The inclusion of appropriate SuDs to manage surface water flood risk in the town, to provide betterment for the community via urban Opportunities for managing flood risk through greening, water capture schemes and the appropriate use of materials to enhance the public realm, health, wellbeing, biodiversity and air quality</b></p>
1013	Policy C4 - West Canvey	<p>The proposal to concentrate significant growth on Canvey Island is underpinned by the SFRA Level 1 and 2 and supporting technical notes. Whilst we are aware of the challenges that tidal and surface water flood risk present, we consider that the Environment Agency and Lead Local Flood Authority (LLFA) are best placed to advise on the principle of whether these risks can be managed through suitable adaptation and mitigation measures, identified in the SFRA reports, and the recommendations proposed. Anglian Water considers that proposals for the densification of West Canvey would require a surface water drainage strategy to demonstrate the effective</p>	<p><u>Policy C4 - West Canvey</u></p> <p><u>Modification to Policy: New Paragraph</u></p> <p><b>2. A surface water drainage strategy to demonstrate the effective management of surface water flood risk across the site,</b></p>

Rep Number	Policy/Paragraph Reference	Summary of Representation/comment from Anglian Water	Agreed response and modifications
		<p>management of surface water flood risk across the site, with the priority for reuse and SuDS in accordance with the drainage hierarchy, and consistent with the requirements of Policy SD3.</p> <p>Our sewerage networks can be adversely affected by surface water flooding, which can cause further impacts such as hydraulic overloading – leading to spills and pollutions. Connection to our surface water sewer network should be the final option for discharge, if all other options are demonstrated to be infeasible. Our surface water guidance sets out our approach to different development scenarios.</p> <p>Reference to urban greening and the introduction of sustainable drainage is made in paragraph 8.39 of the supporting text, and pre-application discussions with the Lead Local Flood Authority. We would therefore expect the policy to reflect this approach in more specific terms or at least refer the need for compliance with Policy SD3. Moreover, the supporting text should also reference the need for pre-application engagement with Anglian Water if a connection to the public surface water sewerage system is proposed.</p> <p>Proposed Modifications:</p> <p>Policy C4 should require a surface water drainage strategy to demonstrate the effective management of surface water flood risk across the site, with the priority for reuse and SuDS in accordance with the drainage hierarchy, and consistent with the requirements of Policy SD3.</p> <p>The supporting text should also reference the need for pre-application engagement with Anglian Water if a connection to the public surface water sewerage system is proposed.</p>	<p><b>with the priority for reuse and SuDS in accordance with the drainage hierarchy.</b></p> <p><u>Modifications to Supporting Text</u></p> <p>8.39 To ensure environmental quality, <b>and to reduce the risks of adverse impacts from surface water, hydraulic overloading and pollution,</b> <del>it is expected that the regeneration of west Canvey will include urban greening and the introduction of sustainable drainage.</del> <b>must be supported by a surface water drainage strategy. The Strategy will be fully informed by engagement with key partners including the Environment Agency, Water utilities companies and Essex County Council (as Lead Local Flood Authority) and will prioritise consideration of SuDS and urban greening.</b></p> <p><b>8.40</b> SuDS should be the principal but may not be the only method.</p>

Rep Number	Policy/Paragraph Reference	Summary of Representation/comment from Anglian Water	Agreed response and modifications
			<p>SuDs are often most viable when considered early in the design process, so developers are encouraged to engage in pre-application discussions with Essex County Council (as Lead Local Flood Authority), and refer to ECC's SuDS Design Guide, and any future updates, when preparing applications incorporating SuDS schemes. These are critical to address the impacts of climate change in an urbanised environment and especially in a low-lying area such as Canvey. Furthermore, it is expected that the development will integrate with multi-functional green infrastructure in the area such as Canvey Wick SSSI and west Canvey Marshes to provide recreation and time in nature opportunities for residents.</p> <p><b>Developers should engage with Anglian Water as early in the process as possible, if a connection to the public surface water sewerage system is proposed).</b></p>

Rep Number	Policy/Paragraph Reference	Summary of Representation/comment from Anglian Water	Agreed response and modifications
1013	Policy C6 - The South Canvey Green Lung	<p>Anglian Water supports the principle of the Green Lung designation in helping to support nature recovery on Canvey Island and consistency with the aims of the Local Nature Recovery Strategy for Essex.</p> <p>However, whilst our Canvey Island water recycling centre (WRC) is mainly excluded from the Green Lung designation on the Policies Map, it does not reflect all our operational land for this site. Our landownership for Canvey Island WRC extends further than shown on the Policies Map and includes part of the access to our site and a strip of land that contains the final effluent pipe extending from the south of the WRC to the coastline.</p> <p>Anglian Water requests that the Policies Map excludes the entirety of our WRC operational land from the land indicated as 'Green Lung' (and any overlapping area identified as 'Park Homes' sites) to ensure that future operational or engineering works required in relation to maintaining or improving our essential wastewater infrastructure is not constrained by the designation. Anglian Water can provide the Council with details of our operational land/landownership for this site to assist with accuracy of the Policies Map and the attributed land designations.</p>	<p>Modification: Policies Map to be modified in accordance with Anglian Water operational land/land ownership mapping, as illustrated below:</p> 
1013	Chapter 9 Benfleet	NOTE Consistency issue: Anglian Water recognises there are a number of redevelopment and regeneration opportunities within the town, at various sites.	NPPF paragraph 16 states that Plans should avoid unnecessary

Rep Number	Policy/Paragraph Reference	Summary of Representation/comment from Anglian Water	Agreed response and modifications
		<p>Some of the site allocation policies (Policy B3, B5, B6) includes the requirement that "the development proposal is compliant with all other relevant policies of this Plan"; however, none of the other site allocations for Benfleet include this requirement. We question whether all allocation policies require this criterion to ensure that the plan is read as a whole, or whether specific policy requirements such as the submission of a surface water drainage strategy should be specifically included? Similarly, the supporting text (paragraph 9.30) Policy B8 Manor Trading Estate references the inclusion of urban greening and introduction of sustainable drainage, but the policy includes no such requirement.</p> <p>The SFRA Level 2 recommendations stated that for all proposed development sites "peak surface water runoff rate from the development must be as close as reasonable practicable to the greenfield runoff rate...[and] Development proposals must demonstrate that the surface water will be managed and discharged from the site in accordance with the drainage hierarchy." This would suggest that either all the policies require the submission of a surface water drainage strategy that demonstrates that peak surface water runoff rates are no greater than equivalent greenfield run-off rates and the discharge of the surface water should be managed in accordance with the drainage hierarchy OR are consistent with the requirements of Policy SD3.</p>	<p>duplication of policies that apply to a particular area.</p> <p>Policies should not be read in isolation, and the Castle Point Plan is to be read as a whole.</p> <p><u>Modification to policies B5 and B6</u> Remove sentence 'The proposal is compliant with all other relevant policies of this Plan'</p> <p>Note the similar sentence in Policy B3 is retained since it specifically also refers to another policy (B2).</p>
1013	Policy Had4 - Land South of Scrub Lane	<p>NOTE Consistency issue: Anglian Water recognises there are a number of redevelopment and regeneration opportunities within the town, at various sites.</p> <p>This site allocation policy includes the requirement that "the development proposal is compliant with all other relevant policies of this Plan"; however,</p>	<p><u>Modification to Policy Had4</u></p> <p>Remove sentence 'The proposal is compliant with all other relevant policies of this Plan'</p>

Rep Number	Policy/Paragraph Reference	Summary of Representation/comment from Anglian Water	Agreed response and modifications
		none of the other site allocations for Hadleigh include this requirement. We question whether all allocation policies require this criterion to ensure that the plan is read as a whole, or whether specific policy requirements such as the submission of a surface water drainage strategy (in accordance with Policy SD3) is required. Whilst surface water flood risk is not identified in the supporting text the SFRA Level 2 recommendation suggests all proposed development sites would need to demonstrate that surface water run-off is managed and discharged in accordance with the drainage hierarchy.	Note This is done for consistency between policies.
1013	Policy Thun2 – Kiln Road Campus	NOTE Consistency issue: Anglian Water recognises there are redevelopment and regeneration opportunities within the town, at various sites. This site allocation policy and Policy Thun 3 includes the requirement that "the development proposal is compliant with all other relevant policies of this Plan". We question whether all allocation policies require this criterion to ensure that the plan is read as a whole, or whether specific policy requirements such as the submission of a surface water drainage strategy (in accordance with Policy SD3) is required. Similarly, surface water flood risk is identified in the supporting text (para 11.16). The SFRA Level 2 recommendation suggests all proposed development sites would need to demonstrate that surface water run-off is managed and discharged in accordance with the drainage hierarchy.	<u>Modification to policies Thun2 and Thun3</u> Remove sentence 'The proposal is compliant with all other relevant policies of this Plan'  Note This is done for consistency between policies.
1013	Policy SD1 - Tidal Flood Risk Management	NOTE: It is noted that the regeneration and redevelopment of brownfield sites on Canvey Island (Flood Zone 3a) will have to meet the Sequential Test and where appropriate the Exceptions Test. Whilst the measures in the policy are to ensure that new development is designed to be flood resistant and resilient, the supporting infrastructure, such as sewerage infrastructure, is likely to require significant investment and capital carbon in new infrastructure and ongoing maintenance, but will undoubtedly be at a much	Noted

Rep Number	Policy/Paragraph Reference	Summary of Representation/comment from Anglian Water	Agreed response and modifications
		higher risk from the impacts of tidal flooding due to the fact our infrastructure is underground, and vulnerable to flood events	
1013	Policy SD2 - Non-Tidal Flood Risk Management	<p>NOTE: Whilst Anglian Water is a Risk Management Authority in terms of managing flood risks from our infrastructure, we also need to be cognisant of the impacts of new development and other forms of flood risk, such as surface water and groundwater flooding, on the resilience of our sewerage infrastructure, given our duty to ensure the area we serve is 'effectively drained'. We support the requirement for all development to integrate SuDS to contribute to the management of surface water flood risk - however this is contradicted in Policy SD3 by applying to all 'major' development (see our representation to Policy SD3).</p> <p>Supporting infrastructure for new housing and employment growth, such as our sewerage infrastructure, is likely to require significant investment and capital carbon in delivering new infrastructure and ongoing maintenance but will undoubtedly be at a much higher risk from the impacts of surface water flooding due to the fact our infrastructure is underground, and therefore vulnerable to flood events.</p>	<p>Policy SD2(9) relates to Policy SD3(1). SD3(1) states that <i>'all new development will be required to incorporate water management measures to reduce surface water run-off or adverse impact on water quality and ensure that it does not increase flood risk elsewhere'</i>. It further continues that <i>'The principal method to do so should be the use of Sustainable Drainage Systems (SuDS).'</i></p> <p>It is therefore considered implicit in both SD2 and SD3 that SuDS is required for all development.</p> <p>The reference to 'major' development in the consulted version of Policy SD3 relates to the requirement to submit a full drainage strategy, rather than SuDS.</p>
1013	Policy SD3 – Sustainable	Anglian Water supports the policy requirements for SuDS in principle. Whilst we recognise that the LLFA is a statutory consultee for major planning	<u>Modification to policy SD3</u>

Rep Number	Policy/Paragraph Reference	Summary of Representation/comment from Anglian Water	Agreed response and modifications
	e Drainage Systems (SuDS)	<p>applications, we would seek drainage strategies to be submitted for all major and minor development to avoid any cumulative impacts on surface water flood risk, particularly where smaller developments may seek to connect to the public sewerage network. This would be consistent with clause 9 of Policy SD2, and recommendation 5-13 in the SFRA Level 1.</p> <p>Our Surface Water Risk Management Guidance provides comprehensive approach to how we will assess different types of site in terms of surface water connections.</p> <p><a href="https://www.anglianwater.co.uk/siteassets/developers/development-services/aws-surface-water-guide-sm.pdf">https://www.anglianwater.co.uk/siteassets/developers/development-services/aws-surface-water-guide-sm.pdf</a></p> <p>For new surface water connections to an existing surface water sewer Anglian Water will need to ensure the surface water hierarchy has been followed and require developers to liaise with the Lead Local Flood Authority (LLFA) - this is an essential pre-requisite to Anglian Water accepting a surface water drainage strategy. If LLFA are satisfied that, based upon evidence, no other option is feasible then a connection point may be made to the surface water sewer at a rate agreed with LLFA, subject to there being existing capacity or the provision of network reinforcement to accommodate the flow.</p> <p>The developer is responsible for providing the appropriate surface water disposal infrastructure. As such, all the work to determine the feasibility of a connection to the existing surface water sewer complete with all upgrades to the consented outfall is to be carried out by the developer at their cost. Anglian Water will request a planning condition to ensure no additional flow will be connected until, any identified upgrades have been delivered and sufficient capacity in the network has been demonstrated.</p> <p>Should network reinforcement be required because of additional surface water flow to an existing public surface water sewer, Anglian Water will request a planning condition to ensure no additional flow will be connected</p>	<p>2. All <del>major</del> <b>qualifying</b> development, will be required to submit a drainage strategy to demonstrate <b>that the surface water hierarchy has been followed</b>, how both on and off-site flood risk will be managed and <b>how</b> mitigation measures <del>should</del> <b>will</b> be satisfactorily integrated into the design and layout of the development.</p> <p><u>New paragraph 21:35</u>  <b>Qualifying development is major development (as defined in the GPDO) and minor development which seeks to connect to the public sewerage network.</b></p> <p><u>Consistency with SFRA recommendation 5.13</u></p> <p>Part 1 of Policy SD3 requires all development to reduce surface water run-off which is considered to reflect the SFRA recommendation.</p>



Rep Num ber	Policy/Para graph Reference	Summary of Representation/comment from Anglian Water	Agreed response and modifications
		<p>until sufficient capacity in the network has been demonstrated. Reinforcement of the existing network, when required as a consequence of a new surface water connection, is not included within the Infrastructure Charge. These works may be requisitioned under Section 98 of the Water Industry Act 1991 or implemented by a self-lay provider under Section 151 of the Water Industry Act 1991, with the capital cost fully chargeable to the applicant. A cost and time-scale estimate can be provided for requisitioned network reinforcement.</p> <p>Anglian Water would seek to ensure that our surface water guidance is referenced in the supporting text, so that developers/applicants are aware of the approach we use when considering surface water drainage for new development. We agree that no developments should connect surface water discharge to the foul network. Our surface water networks are designed for the existing catchment; therefore it is assumed to have minimal residual capacity for additional flow. Once approval in principle has been reached with LLFA, detailed analysis can be undertaken to establish the receiving surface water network capacity. Detailed analysis will be required to establish whether there is existing capacity to accommodate the proposed connection and if not, to advise on the extent of network reinforcement required. The developer is responsible for providing the appropriate surface water disposal infrastructure. As such, all the work to determine the feasibility of a connection to the existing surface water sewer complete with all upgrades to the consented outfall is to be carried out by the developer at their cost. Anglian Water.</p> <p>Anglian Water supports the link between SuDS and water efficiency measures through rainwater harvesting and reuse. Anglian Water works with a wide range of partners through the Ofwat Innovation Fund project - Enabling Water Smart Communities, which provides useful information on</p>	

Rep Number	Policy/Paragraph Reference	Summary of Representation/comment from Anglian Water	Agreed response and modifications
		opportunities for integrated water management including water reuse in new developments.	
1013	Policy SD6 - Pollution Control	<p>Anglian Water supports the policy to manage and reduce pollution, particularly through water efficient design and the installation of SuDS and delivery of multi-functional green infrastructure. We welcome clause 2 which includes reference to new development being affected by an adverse effect on the environment. We deduce from this statement, that this includes introducing an 'agent of change' to an area, something which is also alluded to in clause 3 regarding impacts on existing businesses and community facilities.</p> <p>NOTE: Anglian Water would suggest the supporting text could include specific reference to wastewater infrastructure facilities such as pumping stations and our water recycling centres where we seek to recommend new development (particularly residential development) avoids encroachment on our assets due to the proximity of sensitive receptors and potential loss of amenity due to odour and/or noise arising from the operation of our essential infrastructure.</p>	<p><u>Modification: New paragraph</u></p> <p><b>21.56 Development proposals should be mindful of proximity to wastewater infrastructure facilities such as pumping stations and water recycling centres due to the presence of sensitive receptors and potential loss of amenity due to odour and/or noise arising from the operation of essential infrastructure.</b></p>
1013	Policy SD9 – Water Supply and Waste Water	<p>Anglian Water strongly supports the policy requirements. In addition to the publications referenced in the supporting text, the tighter water efficiency standard of 90 litres per person per day (l/p/d) aligns with the Shared Standards for Water Efficiency in Local Plans, which was published in June 2025.</p> <p>These Shared Standards set out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex &amp; Suffolk Water, Affinity Water, the Environment Agency and Natural England, with the full endorsement of Water Resources East (WRE) as part of strengthening the Regional Water Resources Plan for Eastern England. It recommends that Local Planning Authorities (LPAs) include tighter water efficiency standards in Local Plan</p>	<p>Support noted.</p> <p>Note this policy has been subject to proposed modifications and additions (Also in response to reps from Essex County Council, Natural England and Essex &amp; Suffolk Water.)</p> <p>CPBC have commissioned consultants to prepare a Water</p>

Rep Number	Policy/Paragraph Reference	Summary of Representation/comment from Anglian Water	Agreed response and modifications
		<p>policiesto support a clean and sustainable supply of water - essential for growth and nature recovery.  <a href="https://www.anglianwater.co.uk/siteassets/developers/new-content/p--c/shared-standards-in-water-efficiency-for-local-plans.pdf">https://www.anglianwater.co.uk/siteassets/developers/new-content/p--c/shared-standards-in-water-efficiency-for-local-plans.pdf</a></p> <p>The Shared Standards recommend that LPAs include Local Plan Policies that:</p> <ul style="list-style-type: none"> <li>• Require new homes to be built to more stringent standards for water efficiency than the optional Building Regulations (part G) standard of 110 litres per person per day (l/p/d). Evidence indicates that a design standard of up to 85 litres/person/day (l/p/d) for residential developments is feasible (suggests a range between 85-95 l/p/d subject to viability and feasibility).</li> <li>• Require new, extended or redeveloped non-domestic development to aim to achieve full credits in the BREEAM water calculator.</li> <li>• Require new major non-domestic developments to include water saving measures and water reuse in their design.</li> </ul> <p>These standards provide guidance and local evidence to help LPAs make a case that more stringent water efficiency policies are justified, feasible and viable as part of Water Cycle Studies and Integrated Water Management Plans that effectively manage a range of challenges across the water environment and aid nature recovery. Local Plans have a significant role in helping to deliver the sustainable use of water resources and address shorter-term water scarcity issues. LPAs can help ensure the risk of harm to habitats and deterioration to water bodies due to water scarcity is minimised by setting more ambitious, tighter water efficiency standards for new residential and non-domestic developments in local planning policy.</p>	<p>Capacity Assessment. This work is programmed from completion in Q1 2026. CPBC will continue to keep AW informed of this additional work. This will supplement the Shared Standards for Water Efficiency in Local Plans.</p> <p>Modification to Policy SD9:</p> <ol style="list-style-type: none"> <li>1. All new residential development will be required to achieve a water efficiency standard of <b>85 90</b> litres per person per day <b>of mains supplied water/potable water</b> <del>Where it can be demonstrated that this is no feasible part G2 and regulation 36(2)(b) of the Building Regulations will apply.</del></li> <li>2. <del>All non-residential development should achieve full credits for Wat 04 of BREEAM.</del> <b>New, extended or redeveloped non-household ('non-household' means all development except residential dwellings.) buildings aim to achieve full</b></li> </ol>

Rep Number	Policy/Paragraph Reference	Summary of Representation/comment from Anglian Water	Agreed response and modifications
		<p>Whilst Anglian Water is not the statutory water undertaker for Castle Point, tighter water efficiency standards mean lower flows of wastewater that consequently result in less operational carbon being expended in pumping flows through our networks and treatment at our WRCs. As a partner to the Shared Standards, we endorse the requirement for 90 l/p/d for new residential development and for all new non-household (commercial development) to meet the full credits in BREEAM's WAT 01 calculator. In terms of wastewater and policy clause 4 - we endorse this policy approach for wastewater infrastructure which aligns with similar policies in other Local Plans across our region. Anglian Water advises developers to seek early engagement on their proposals for wastewater connections. For example, we may require a sustainable point of connection to our network, particularly where a site may trigger a number of risks - such as pollution risks and CSO spills, surcharges of our network, existing flood potential and excess surface water flooding. We welcome the supporting text set out in paragraphs 21.72 - 21.76 which clearly define our role and investment in sewerage infrastructure.</p>	<p><b>credits within the 4 water categories (WAT01, WAT02, WAT03, and WAT04) for BREAAAM standard within a minimum score of 3 credits within WAT01 Water Consumption issue category, or an equivalent standard set out in any future update to BREAAAM. The applicant will be required to justify and evidence why full credits is not possible/viable for the development.</b></p> <p>A new paragraph to be added to the reasoned justification:</p> <p><b>The <u>Shared Standards in Water Efficiency for Local Plans</u> (June 2025) are developed by Natural England, the Environment Agency, and water companies endorsed by Water Resources East to provide advice and evidence to Local Planning Authorities (LPAs) on how they can secure higher water</b></p>

Rep Num ber	Policy/Par agraph Reference	Summary of Representation/comment from Anglian Water	Agreed response and modifications
			efficiency standards for new homes and commercial developments.

#### **4. Areas Without Agreement (Uncommon Ground)**

4.1 There are no areas without agreement.

#### **5. Ongoing Cooperation**

5.1 CPBC will continue to work cooperatively with Anglian Water throughout the examination of the Castle Point Plan and through their role as a statutory undertaker in the provision of sewerage and drainage services and as a statutory consultee for plan making and planning applications.

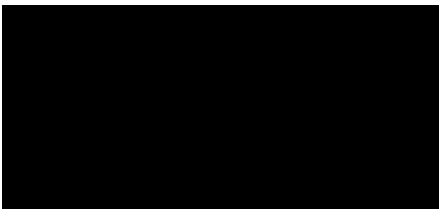
## Signatories



For and on behalf of Castle Point Borough Council:

**Name and Position:** Amanda Parrott, Assistant Director, Climate and Growth

**Date:** 2 December 2025



For and on behalf of Anglian Water Services Ltd:

**Name and Position:** Phil Jones – Growth Strategy Manager

**Date:** 02/12/2025



# **Statement of Common Ground**

## **Castle Point Plan 2026 to 2043**

### **Regulation 19 Draft**

Between

Castle Point Borough Council

and

Essex & Suffolk Water

December 2025



## **1. Introduction**

- 1.1 This Statement of Common Ground (SoCG) has been prepared jointly by Castle Point Borough Council (CPBC) and Essex & Suffolk Water in relation to the Castle Point Local Plan (known as the Castle Point Plan).
- 1.2 The purpose of this SoCG is to set out the areas of agreement and any outstanding matters between the parties, in accordance with the requirements of the National Planning Policy Framework (NPPF, paragraph 28) and the Planning Practice Guidance.
- 1.3 CPBC has fully engaged with Essex & Suffolk Water on the development of the Castle Point Plan from the outset with regards its role as statutory consultee.
- 1.4 In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, Essex & Suffolk Water has been formally consulted at Regulation 18 and 19 stages of consultation.
- 1.5 This SoCG identifies the matters on which CPBC and Essex & Suffolk Water are agreed, as well as any areas where differences remain.

## **2. Strategic Matters**

- 2.1 Essex & Suffolk Water and CPBC agree and work collaboratively on Castle Point Plan policies SP3, SD9 and employment land policies

## **3. Areas of Agreement (Common Ground)**

- 3.1 Essex & Suffolk Water submitted representations to the Castle Point Plan during the Regulation 19 Draft Consultation (August to September 2025) on 25<sup>th</sup> September 2025. Essex & Suffolk Water confirmed their position during the further consultation (October to December 2025).
- 3.2 Essex & Suffolk Water welcomes the overall content and vision of the Local Plan and commend the Council on reaching this detailed stage of development. Both parties acknowledge the importance of water resources, supply and demand forecasting and water efficiency and look forward to future engagement as the Castle Point Local Plan progresses.
- 3.3 The entries in the table below set out the agreed modifications to the Castle Point Plan, which therefore resolve all of the representations from Essex & Suffolk Water. All of the modifications in this SoCG have been included in the Council's Schedule of Modifications

<b>Rep Number</b>	<b>Policy/Paragraph Reference</b>	<b>Summary of Representation/comment from Essex &amp; Suffolk Water</b>	<b>Agreed response and modifications</b>
0339	General Comment	Essex & Suffolk Water's published Water Resources Management Plan 2024 (WRMP24) shows that forecasted Essex WRZ supply demand balance surplus is less than 10Mld until 2029, and no more than 26 Mld until 2035. This forecast does not include the increase in domestic water supply required as a result of the NPPF Government five-year housing plan published in November 2024.	Forecasted figures noted as a factor in forward planning.
0339	General Comment	Water scarcity is a significant issue in Essex with our full supply area being classified as a serious Water Stressed Area. Consequently, it is important that future development is designed to be water efficient and aligned to national targets for reducing per capita consumption and business demand.	Agreed aim that that future development is designed to be water efficient and aligned to national targets for reducing per capita consumption and business demand.
0339	Castle Point Infrastructure Delivery Plan	As noted in the Infrastructure Delivery Plan (paragraph 10.20.2) as part of the evidence for your local plan, Essex & Suffolk Water has identified infrastructure improvements that will be needed to accommodate the proposed levels of growth across our operating area. These improvements include mains rehabilitation works, water main reinforcements and duplications to ensure supply is maintained. We strongly encourage the submission of pre planning enquiries to Essex & Suffolk Water (ESW) as this will help planning changes as efficiently and effectively as practicable.	Noted.

Rep Number	Policy/Paragraph Reference	Summary of Representation/comment from Essex & Suffolk Water	Agreed response and modifications
0339	Policy SP3 Meeting development Needs.	<p>The housing requirement set out in Policy SP3 is stepped, with a minimum of 209 new homes per year for the years 2026-31 (years 1 to 5), increasing to 253 new homes per year for 2031-2036 (years 6-10) and at least 554 homes per year from 2036-43 (years 11 to 17). We note most of the housing allocation sites are within Canvey, Benfleet, Hadleigh and Thundersley.</p> <p>In terms of water supply, water companies have a statutory obligation to meet and supply all domestic demands but are not statutory consultees on planning applications. In accordance with our legal obligations, we will provide connections to our network for all housing developments but would welcome further discussion with you regarding build profiles and timings so that we can plan this work as efficiently as possible.</p> <p>To ensure we have a sufficient lead-in time to address any potential water supply issues ahead of planning permission being granted, for both employment land or housing provision, we strongly encourage developers to submit a pre-planning enquiry to Essex &amp; Suffolk Water (ESW) (<a href="http://www.eswater.co.uk/developers/large-developer/pre-planning-enquiry">www.eswater.co.uk/developers/large-developer/pre-planning-enquiry</a>). We would be grateful if this could be made a requirement of</p>	<p>Build profiles and timings will be subject to confirmation at Plan adoption and monitored via the Annual Monitoring report (AMR) and housing land supply monitoring (see <a href="#">Housing Topic Paper</a>), which are publicly available.</p> <p>Whilst Councils can encourage pre-application discussions, it is an optional, discretionary service and cannot be made a requirement.</p> <p>The constraints derived from unaligned geographic boundaries and of unaligned business and spatial planning timescales are noted.</p>

Rep Number	Policy/Paragraph Reference	Summary of Representation/comment from Essex & Suffolk Water	Agreed response and modifications
		<p>your planning process. This will allow us to assess the proposals and provide timely feedback before applications are formally submitted and considered by the planning authority.</p> <p>It is important to reiterate that Essex &amp; Suffolk Water considers all applications across our entire operating area carefully, covering several councils and many varied development plans. Please be aware that ESW water supply area boundaries will not necessarily align with that of any council's and the positioning and volume requirements of any connection new to our water network will impact on the costs associated. Similarly, the timing of any council's planning is unlikely to coincide with the timing of our own business planning, and we must be considerate to all our regulators.</p>	
0339	Caravan Parks (element of Policy SP3 and relationship to Policy SD9	We note that the replacement of old caravans at Thorney Bay Caravan Park does not need planning consent but does contribute to housing supply. Over the Plan period it is expected that a total of 173 park homes will replace existing caravans at this site. It is not clear whether they are obliged to conform to policy SD9, and so we would ask the council to ensure all new caravans, including those on all sites in the Borough, meet water efficiency standards set out in Policy SD9	Park homes are generally exempt from UK Building Regulations (including Part G water efficiency standards) because they are considered a type of mobile, transportable dwelling. Instead of the Building Regulations, new park homes intended for permanent residential use must comply with the British Standard <b>BS 3632 which</b> promotes water efficiency through requirements for specific types of plumbing systems and water-using appliances, it does

Rep Number	Policy/Paragraph Reference	Summary of Representation/comment from Essex & Suffolk Water	Agreed response and modifications
			<p>not use the same quantifiable l/p/d target or the same regulatory framework as Part G of the Building Regulations.</p> <p>The Council will encourage compliance with relevant water efficiency standards as far as possible.</p>
0339	Policy SD9 Water Supply and Waste Water.	<p>We welcome Policy SD9 Water Supply and Waste Water.</p> <p>While we acknowledge that this policy states that all new residential developments will be required to achieve a water efficiency standard of 90 litres per person per day (PCC), we wish to formally draw your attention to the recently published regional shared standards for water efficiency in local plans, Shared Standards in Water Efficiency for Local Plans.</p> <p>The Shared Standards for Water Efficiency in Local Plans was published in June 2025. These Shared Standards set out a collaborative and collective approach by Essex &amp; Suffolk Water, Cambridge Water, Essex &amp; Suffolk Water, Affinity Water, the Environment Agency and Natural England, with the full endorsement of Water Resources East (WRE) as part of strengthening the Regional Water Resources Plan for Eastern England. It recommends that Local Planning Authorities (LPAs) include tighter water efficiency standards in Local Plan policies to support a</p>	<p>CPBC have commissioned consultants to prepare a Water Capacity Assessment. This work is programmed from completion in Q1 2026. CPBC will continue to keep NE informed of this additional work. This will supplement the Shared Standards for Water Efficiency in Local Plans.</p> <p>Suggested Modification to Policy SD9:</p> <p>1. All new residential development will be required to achieve a water efficiency standard of <b>85 90</b>-litres per person per day <b>of mains supplied water/potable water per person per day</b>. <del>Where it can be demonstrated that this is no feasible part G2 and regulation 36(2)(b) of the</del></p>

Rep Number	Policy/Paragraph Reference	Summary of Representation/comment from Essex & Suffolk Water	Agreed response and modifications
		<p>clean and sustainable supply of water - essential for growth and nature recovery.</p> <p>The Shared Standards recommend that LPAs include Local Plan Policies that:</p> <ul style="list-style-type: none"> <li>• Require new homes to be built to more stringent standards for water efficiency than the optional Building Regulations (part G) standard of 110 litres per person per day (l/p/d). Evidence indicates that a design standard of up to 85 litres/person/day (l/p/d) for residential developments is feasible.</li> <li>• Require new, extended or redeveloped non-domestic development to aim to achieve full credits in the BREEAM water calculator.</li> <li>• Require new major non-domestic developments to include water saving measures and water reuse in their design.</li> </ul> <p>These standards provide guidance and local evidence to help LPAs make a case that more stringent water efficiency policies are justified, feasible and viable as part of Water Cycle Studies and Integrated Water Management Plans that effectively manage a range of challenges across the water environment and aid nature recovery. Local Plans have a significant role in helping to deliver the sustainable use of water resources and address shorter-term water scarcity issues. LPAs can help ensure the risk of harm to habitats and deterioration to water bodies due to water scarcity is minimised by</p>	<p><del>Building Regulations will apply.</del></p> <p><del>2. All non-residential development should achieve full credits for Wat 01 of BREEAM.</del> <b>New, extended or redeveloped non-household ('non-household' means all development except residential dwellings.) buildings aim to achieve full credits within the 4 water categories (WAT01, WAT02, WAT03, and WAT04) for BREAAM standard within a minimum score of 3 credits within WAT01 Water Consumption issue category, or an equivalent standard set out in any future update to BREAAM. The applicant will be required to justify and evidence why full credits is not possible/viable for the development.</b></p> <p>A new paragraph to be added to the reasoned justification:</p>

Rep Number	Policy/Paragraph Reference	Summary of Representation/comment from Essex & Suffolk Water	Agreed response and modifications
		<p>setting more ambitious, tighter water efficiency standards for new residential and non-domestic developments in local planning policy.</p> <p>At present it is feasible to achieve a total consumption of 85 litres/person/day by taking a fittings-based approach using product types outlined in the Shared Standards Annex C - Section C2, which can be achieved at relatively low cost.</p> <p>These standards aim to drive meaningful progress in water efficiency. Achieving this enhanced level of performance not only contributes to environmental sustainability but also strengthens the resilience of future developments in the face of growing pressures on water resources, driven by climate change and population growth.</p> <p>Whilst we recognize that an 85 litres/person/day PCC target, explained in the shared standards, may be challenging, we expect it to be very achievable within the timeframe of this plan and so we will be encouraging this target through our financial reward scheme of environmental incentives for developers. These are tied into Company Business Plans that are published every five years with the latest being published in 2025.</p> <p>Policy SD9 will support sustainable growth in Castle Point by promoting greater water efficiency in new developments, while longer-</p>	<p><b>The Shared Standards in Water Efficiency for Local Plans (June 2025) are developed by Natural England, the Environment Agency, and water companies endorsed by Water Resources East to provide advice and evidence to Local Planning Authorities (LPAs) on how they can secure higher water efficiency standards for new homes and commercial developments.</b></p>

Rep Number	Policy/Paragraph Reference	Summary of Representation/comment from Essex & Suffolk Water	Agreed response and modifications
		term water supply solutions are planned and delivered. Water efficient new development means demands will be less than otherwise would be the case, which in turn means the quantity of water we need to abstract from the environment is also less. This supports national objectives for sustainable abstraction as set out in the National Framework for Water Resources 2025.	
0339	Employment Need and Employment Land	<p>We are fully committed to supporting economic growth across the region and in the Borough of Castle Point and continue to invest in infrastructure enhancements to improve water distribution. However, it is important to note that, unlike domestic supplies, we do not have the same statutory obligation to provide water for non-domestic purposes and may be unable to immediately do so if the new water requirement is greater than the residual capacity in our network. We therefore have a particular interest in proposed strategic employment and economic development within your administrative area so that we can plan timely investment to increase capacity should it be needed.</p> <p>Policy B8 Manor Trading Estate and Policy C4 West Canvey explain that the regeneration and renewal of their respective areas will be carried out through a master plan approach.</p>	<p>Throughout the Castle Point Plan, the need to collaborate with a range of stakeholders to ensure delivery of development is highlighted. Paragraph 16.38 identifies that through the master plan process, infrastructure providers will be engaged, however it is agreed this could be clarified further through Policy D3.</p> <p>Policy D3 - Master Planning 1. Where this Plan requires the use of Master Plans for allocated sites, these will be approved by the Council in advance of the determination of any planning application. Where sites are in multiple ownership this will ensure that any individual parcels will not prejudice the future development of other parts of the site, adjoining land, or frustrate the delivery of the site allocation or wider area. 2. In preparing the Master Plan, the Council requires the</p>



Rep Number	Policy/Paragraph Reference	Summary of Representation/comment from Essex & Suffolk Water	Agreed response and modifications
		<p>Policy E1 Development on Strategic Development Land states that the council will seek to provide and maintain classes B2 and B8 and another suitable Class B uses.</p> <p>We are keen to work collaboratively with the Local Authority's Economic Development and Planning teams to gain a detailed understanding of the nature of the proposed development. The development is expected to fall broadly within Use Classes B2, B8, and other Class B categories which can encompass a wide range of commercial activities with significantly varying water supply requirements. We are currently updating our policy position on large non-household developments requiring significant mains water for non-domestic use including but not limited to data centres, giga factories and hydrogen production plants.</p> <p>However, we can confirm that we will not approve new mains water connections to data centres where the water will be used for open loop cooling systems as we consider this to be an unsustainable use of water. However, we will consider supplies for closed loop cooling systems on a case-by-case basis through our pre-planning enquiry process.</p> <p>We note that both sites are intended to come forward later in the Plan period, and it is imperative to work collaboratively regarding the</p>	<p>applicant to demonstrate how they have engaged with and sought the views of relevant landowner(s), key stakeholders, <b>infrastructure providers</b> and the local community.</p> <p>Whilst Councils can encourage pre-application discussions, it is an optional, discretionary service and cannot be made a requirement.</p>

Rep Number	Policy/Paragraph Reference	Summary of Representation/comment from Essex & Suffolk Water	Agreed response and modifications
		<p>anticipated timing and phasing of the development and for us to fully understand the nature of the development. Again, we strongly encourage the submission of pre-planning enquiries to Essex &amp; Suffolk Water (ESW) so we can ascertain the water supply needs, and plan and deliver in a timely manner any necessary infrastructure that may be needed. We also understand that, in the early stages of the Plan period, industrial use displaced by the redevelopment of sites for residential or town center purposes may be relocated to designated employment areas. Considering this, we request to be consulted at the earliest opportunity so that we can assess any associated infrastructure requirements in a timely manner.</p>	

#### **4. Areas Without Agreement (Uncommon Ground)**

4.1 There are no areas without agreement.

#### **5. Ongoing Cooperation**

5.1 CPBC will continue to work cooperatively with Essex & Suffolk Water throughout the examination of the Castle Point Plan and through the latter body's functions as both a statutory undertaker in the provision of water supply services and in being a statutory consultee for plan making and planning applications.

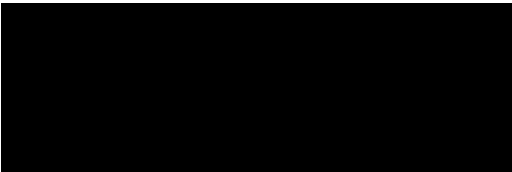
## **Signatories**



For and on behalf of Castle Point Borough Council:

**Name and Position:** Ian Butt – Director of Place and Communities

**Date:** 12 December 2025



For and on behalf of Essex & Suffolk Water

**Name and Position:** Sarah Bowemran, Local Authority Liaison Officer

**Date:** 09/12/2025



# **Statement of Common Ground**

## **Castle Point Plan 2026 to 2043**

### **Regulation 19 Draft**

Between

Castle Point Borough Council

and

Historic England

November 2025

## **1. Introduction**

1.1 This Statement of Common Ground (SoCG) has been prepared jointly by Castle Point Borough Council (CPBC) and Historic England (HE) in relation to the Castle Point Local Plan (known as the Castle Point Plan).

1.2 The purpose of this SoCG is to set out the areas of agreement and any outstanding matters between the parties, in accordance with the requirements of the National Planning Policy Framework (NPPF, paragraph 28) and the Planning Practice Guidance.

1.3 CPBC has fully engaged with HE on the development of the Castle Point Plan from the outset with regards its role as statutory consultee.

1.4 In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, HE has been formally consulted at Regulation 18 and 19 stages of consultation together with its accompanying Sustainability Appraisal/Strategic Environmental Assessment.

1.5 This SoCG identifies the matters on which CPBC and HE are agreed, as well as any areas where differences remain.

## 2. Areas of Agreement (Common Ground)

2.1 HE submitted representations to the Castle Point Plan during the Regulation 19 Draft Consultation (August to September 2025) and confirmed their position during the further consultation (October to December 2025).

2.2 The entries in the table below set out the agreed modifications to the Castle Point Plan, which resolve all HE's representations. All modifications in this SoCG are also included in the Council's Modifications Schedule.

Rep Number	Policy/Paragraph Reference	Summary of representation/comment from Historic England	Agreed response and Modifications
0333	Paragraph 10.2	<i>We welcome the numerous references to the historic environment within this chapter, particularly the reference to the Grade I listed Church of St James the Less and Hadleigh Castle. However, to ensure clarity and consistency, we recommend amending paragraph 10.2 to explicitly state that Hadleigh Castle is both a Scheduled Monument and a listed building, as is already done for the Church of St James the Less. This clarification will help readers fully appreciate the significance of both heritage assets'</i>	<u>Modification as follows (<b>bold</b> text additions, strike through deletions).</u>  10.2 Hadleigh Castle ( <b>a Scheduled Monument and Grade 1 listed</b> ) sits to the south of the town centre and dates to Saxon times. Whilst it is in a ruined state, it is the centrepiece of the Hadleigh Castle Country Park, a major tourist attraction within the Borough which was home to the 2012 Olympic Mountain Biking events.
0333	Policy Had1 - Hadleigh Town Centre	We welcome the commitment to preparing a new Hadleigh Town Centre Master Plan, particularly criterion 7, which aims to create	Support noted.

Rep Number	Policy/Paragraph Reference	Summary of representation/comment from Historic England	Agreed response and Modifications
		an appropriate setting for heritage assets, including the Grade I listed Church of St James the Less. As set out in our Good Practice Advice Note 3 (The Setting of Heritage Assets), the setting of a heritage asset can contribute to its significance, as well as to the ability to appreciate that significance. We therefore welcome the focus on public realm improvements that will help sustain and enhance the significance of heritage assets within the town centre by focusing on those aspects of their setting which make a positive contribution to their significance.	
0333	Policy Had2 – Hadleigh Country Park, Hadleigh Farm and Benfleet and Southend Marshes	We welcome the supporting text at paragraph 10.20, which acknowledges the site's visual prominence and its role in forming the setting of Hadleigh Castle. However, to ensure this consideration carries appropriate weight in decision making, we recommend that it be incorporated into Policy Had2 as a new criterion. This would give the issue greater prominence and strengthen the protection of the castle's setting and, in turn, its overall significance.	<p><u>Modification as follows (<b>bold</b> text additions, strike through deletions):</u></p> <p><b>1.</b> Within the area as identified on the Policies Map, the Council will support the following land uses and proposals for development:</p> <p><b>a.</b> 4-Proposals related to the improvement of recreational facilities within the Country Park and maintenance of the Country Park where they do not have a significant impact on <b>Hadleigh</b></p>



Rep Number	Policy/Paragraph Reference	Summary of representation/comment from Historic England	Agreed response and Modifications
			<p><b>Castle or its setting</b>, the landscape, <b>environmental assets</b> or the Green Belt, and comply with the requirements of policy ENV4 and other relevant policies of this Plan;</p> <p><b>b. 2.</b>Proposals related to the development and/or use of the farm for agricultural and/or training purposes in line with the charitable mission of the landowner, where they do not have a significant impact on <b>Hadleigh Castle or its setting</b>, the landscape, <b>environmental assets</b> or the Green Belt, and comply with the requirements of policy ENV4 and other relevant policies of this Plan; or</p> <p><b>c. 3.</b>Proposals for habitat creation and habitat management and mitigation which are complementary to the habitats which already exist on or near the site, with specific regard to the Southend and Benfleet Marshes SPA and Ramsar site.</p> <p><b>2.4.</b>Development proposals must be designed to enable and support the habitat priority measures identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).</p>

Rep Number	Policy/Paragraph Reference	Summary of representation/comment from Historic England	Agreed response and Modifications
			3.5. Development proposals must ensure areas that are identified as an Area of Particular Importance for Biodiversity (APIBs) within the Essex Local Nature Recovery Strategy (LNRS) are protected and where possible enhanced.
0333	Policy DH1 – Green space Connectivity in Daws Heath	We welcome criterion 1, which acknowledges the historic pattern of irregular small fields and ancient woodland. These features make a valuable contribution to the area's historic environment and sense of place. We therefore particularly support the requirement for this landscape character to be protected and enhanced.	Support noted.
0333	Policy D9 – Conserving and Enhancing the Historic Environment	We welcome the comprehensive approach taken in Policy D9 to the conservation and enhancement of the historic environment. The policy provides a clear framework for the consideration of both designated and non-designated heritage assets, and we are pleased to see reference to key	<u>Modification to Policy D9 as follows (<b>bold text additions, strike through deletions</b>):</u>  2. Reference <b>shall</b> be made to the South Benfleet Conservation Area Management Plan and the Florence Gardens Conservation Area Management Plan, as relevant, when determining planning applications in these areas. The South Benfleet Conservation Area Design Code <del>should</del> <b>must</b> be applied when preparing

Rep Number	Policy/Paragraph Reference	Summary of representation/comment from Historic England	Agreed response and Modifications
		<p>supporting documents and management plans.</p> <p>While we consider the policy to be sound, we recommend that the wording is reviewed to replace terms such as “should” with “shall” or “must” where appropriate. This would help to reinforce the requirements and expectations for applicants and decision makers.</p> <p>For ease of access, we also suggest that hyperlinks to the relevant documents (such as the South Benfleet Conservation Area Management Plan, Florence Gardens Conservation Area Management Plan, and the South Benfleet Conservation Area Design Code) are included in the online version of the Plan.</p>	<p>and assessing proposals within the South Benfleet Conservation Area.</p> <p>3. Regard <del>should</del> <b>shall</b> be had to the Historic Environment Record in determining if archaeological remains are present within a proposed development site. Where remains are present, the Council will have regard to the archaeological importance of those remains, the need for the development, the likely extent of any harm, and the likelihood of the proposal successfully preserving the archaeological interest of the site when considering proposals effects on archaeology.</p> <p><u>Further Mods: Additional Hyperlinks</u>  Add hyperlinks to the following references on the online version of the Plan:  Policy D9 part 2 and paragraph 16.72 ‘South Benfleet Conservation Management Area’, ‘South Benfleet Conservation Area Design Code’ ‘Florence Gardens Conservation Area Management Plan’  Para 16.75 and 16.76 <a href="#">Essex County Council’s Essex Historic Environment Record (EHER) database</a></p>

Rep Number	Policy/Paragraph Reference	Summary of representation/comment from Historic England	Agreed response and Modifications
0333	Appendix H	Finally, we recommend including a caveat to clarify that the lists of heritage assets appended to the Plan (Appendix H) are subject to change over time, for example as new non-designated heritage assets are identified or as designations are updated. This will ensure that the Plan remains flexible and up to date as further information becomes available.	Modification to Appendix H as follows ( <b>bold</b> text additions, strike through deletions):  The tables below <del>identifies</del> <b>identify</b> the designated and non-designated heritage assets as set out in Policy D9 <b>as of July 2025. Note that this list may change over time as new non-designated heritage assets are identified or as designations are updated.</b>

### **3. Areas Without Agreement (Uncommon Ground)**

3.1 There are no areas without agreement.

### **4. Ongoing Cooperation**

4.1 CPBC will continue to work with Historic England in their role as a statutory consultee for plan-making and planning applications. HE's expert advice may be sought in relation to specific sites or assets.

## Signatories



For and on behalf of Castle Point Borough Council:

**Name and Position:** Amanda Parrott, Assistant Director, Climate and Growth

**Date:** 25 November 2025



For and on behalf of Historic England:

**Name and Position:** Andrew Marsh, Historic Environment Planning Adviser, East of England Region.

**Date:** 17<sup>th</sup> November 2025



**Statement of Common Ground**

**Castle Point Plan 2026 to 2043**

**Regulation 19 Pre-Submission Draft**

**Between**

**Castle Point Borough Council**

**and**

**The Environment Agency**

**Castle Point Local Plan 2026 to 2043**

Date:

**1. Introduction**

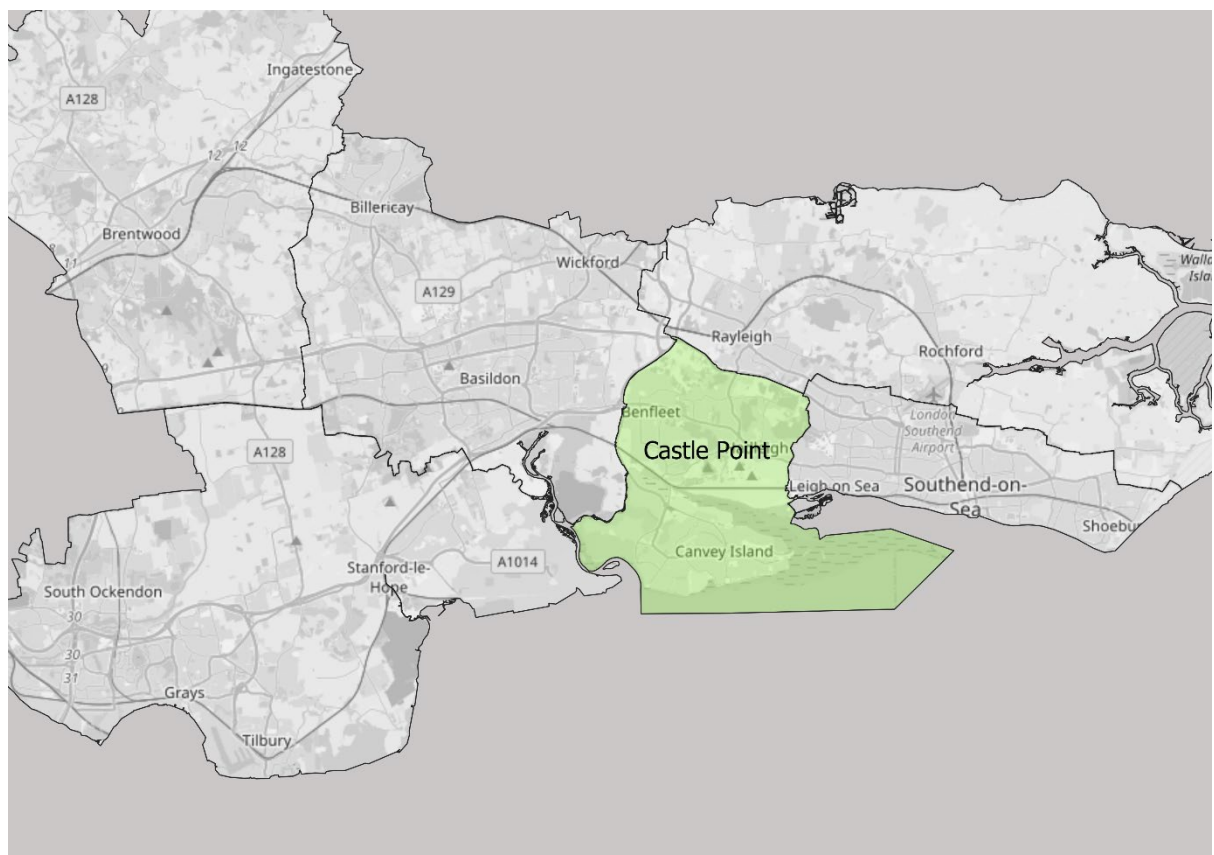
1.1. This Statement of Common Ground identifies areas of agreement between Castle Point Borough Council (CPBC) and The Environment Agency (EA) in relation to Castle Point Plan 2026-2043 and supporting evidence base.

1.2. This statement has been prepared to assist the examination of the Castle Point Plan. The Environment Agency made representations to Regulation 18 Consultation in issues and options and Regulation 19 Publication of the plan drafts published for consultation on 22<sup>nd</sup> July 2024 to 16<sup>th</sup> September 2024 and on 1<sup>st</sup> August 2025 to 26<sup>th</sup> September 2025 consecutively. EA confirmed their response to the Regulation 19 Draft during further consultation on 28<sup>th</sup> October 2025. EA representations cover issues relating to:

- The Level 1 & 2 Strategic Flood Risk Assessments to support the Castle Point Plan

- The SFRA in relation to the housing allocations at Benfleet for B7A Richmond Avenue Carpark and B8 Manor Trading Estate.
- Policy C8 Residential Park Homes
- Policy D6 Residential Annexes

1.3. The map below shows the locations and administrative areas covered by this statement. Castle Point is a small borough in South Essex situated on the Northern Bank of the Thames Estuary. Castle Point Borough Council governs the settlements of Canvey Island, Benfleet, Hadleigh and Thundersley. Around 50% of the Borough falls within Flood risk zone 3 due to tidal flood risk from the Thames Estuary.



1.4. The Environment Agency works to protect and improve the environment to create better places for people and wildlife. It is responsible for regulating major industry and waste; treatment of contaminated land; water quality and resources: fisheries; inland river, estuary and harbour navigations; conservation and ecology and for managing the risk of flooding from main rivers; reservoirs; estuaries and the sea. The Environment Agency leads on tidal flooding and on fluvial flooding from Main River water courses and has a strategic overview for all other sources of flooding. It supports sustainable development and works



with organisations to manage the use of resources, increase resilience to the risks of flooding and coastal erosion and aims to protect and improve water, land and biodiversity.

1.5. Essex County Council is the lead local flood authority (LLFA) and is responsible for managing the risk of flooding from surface water, groundwater and ordinary watercourses and leads on community recovery for Essex including Castle Point.

1.6. The Castle Point 1998 Adopted Local Plan forms the development plan for the Borough. The Castle Point Plan will cover the period of 2026 to 2043. It will focus on regeneration, brownfield redevelopment and increased density in urban areas whilst protecting its green belt and ensuring that growth is climate resilient and supported by essential infrastructure.

## **2. Duty to Cooperate**

2.1. CPBC meets the EA and neighbouring coastal authorities quarterly to develop a Riverside Strategy covering the areas of the Bowers Marshes, Canvey Island and Hadleigh Marshes Policy to help deliver one of the aspirations of the Thames Estuary 2100 plan. The Riverside Strategy will plan for improvements to and management of flood defences, enhancing ecological networks along the coast, as well as improving access to the coast for people as well as improving access to the river and promoting the cultural significance of the Thames.

2.2. CPBC has also collaborated with EA on various environmental strategy documents, and these include the EPOA Planning Policy Statement- Operation Energy and Carbon (Net Zero) October 2025, and the Work of the Essex Climate Action Commission, the Essex Local Nature Recovery Strategy and the Essex Recreational Avoidance and Mitigation Strategy. All of which have been implemented across South Essex authorities.

2.3. The councils of Basildon, Brentwood, Castle Point, Rochford, Southend on Sea, Thurrock and Essex County Council formed a strategic partnership in 2017 to develop a long-term growth ambition which would underpin strategic spatial, infrastructure and economic priorities in South Essex. The collaboration was underpinned by a Memorandum of Understanding (MoU) signed in January 2018 creating the Association of South Essex Local Authorities (ASELA). The membership includes members from each of the six local authorities, and representatives from Essex County Council, the Environment Agency and other Stakeholder Organisations and Business Leaders. In 2023 the leaders and Chief Executives agreed to refresh the identity for the partnership which is now known as South Essex Councils (SEC). The SEC's core purpose is to provide leadership

for South Essex and to deliver a vision for the region up to 2050 in order to promote healthy growth for South Essex Communities. This is achieved through collaboration, by sharing resources, joint evidence and by lobbying government.

2.4. The SEC developed the South Essex 2050 Vision including SEEPARK which aims to link five varied large-scale landscapes including woodland, parkland and marshland across South Essex to provide benefits for ecological diversity, carbon capture and opportunities for leisure, tourism and business. SEEPARK is an ambitious green infrastructure project supported by Natural England, the Environment Agency and South Essex Local Authorities.

2.5. CPBC has fully engaged with EA on the development of its local plan from the outset including advising CPBC on the modelling methodology for the Strategic Flood Risk Assessment. In accordance with the Town and Country Planning (Local Planning) (England) regulations 2004, EA has been formally consulted at each stage of consultation on the Castle Point Plan. The Duty to Cooperate Compliance Statement outlines in detail the engagement activities and outcomes together.

### **3. Strategic Matters: The Thames Estuary**

3.1. The Thames Estuary is formed where the River Thames meets the tidal waters of the North Sea and the Estuary and the low lands abutting it, faces a number of environment challenges including raising sea levels as a result of changes linked to climate change. The Thames Estuary 2100 Plan prepared by the Environment Agency outlines strategies to manage flood risks and protect the estuary's natural habitats and history. The Thames Estuary Asset Management Programme 2100 (TEAM2100) is a 10-year initiative to refurbish and replace tidal flood defences ensuring the integrity for the medium term of the plan. The Thames Estuary Partnership (TEP) works with various stakeholders to enhance and protect the estuary's environmental heritage. These efforts aim to safeguard the Thames Estuary from the impacts of Climate Change and promote sustainable development.

3.2. Through working with the EA and neighbouring authorities CPBC will put in place a Riverside Strategy to implement the Thames Estuary 2100 Plan, and this has formed the basis for Policy ENV2.

### **4. Strategic Issues: Strategic Flood Risk Assessment**

4.1. Castle Point has published a Level 1 & 2 Strategic Flood Risk Assessment in March 2025. This pre-dated the release of the new National Flood Risk

Assessment (NaFRA2) and as a result the changes to flood mapping contained in NaFRA2, were not reflected in the SFRA which supported the regulation 19 consultation. Castle Point has worked with EA during the preparation of its Level 1 & 2 Strategic Flood Risk Assessment.

4.2. The EA referred to the New National Flood Risk Assessment in their response to the Regulation 19 Public Consultation to the Castle Point Plan. It was noted that flood extents at two site allocation sites (Site B7A-Richmond Avenue car park and Site B8 Manor Trading Estate) had changed as a result of the NaFRA2 modelling.

4.3. The SFRA has been updated to take account of the New National Flood Risk Assessment and Sites B7A and B8 have been re-evaluated to ensure that the Sustainability Appraisal and Sequential Test are properly considered, and Level 2 SFRA site assessment has been updated for both sites.

## **5. Policy C8 – Residential Park Home Sites, Canvey Island**

5.1. Canvey island is low lying with ground levels nearly two metres below the daily high tide level in the Thames estuary, and consequently at risk of tidal flooding and is classified as Flood Zone 3. The island is protected by 14 miles of Tidal Flood Defences which provide a very high standard of protection. A 2 mile stretch of the island's revetment has recently been renewed by the EA on its southern shoreline between Thorney Bay and the Island Yacht Club.

5.2. Policy C8 refers to the delivery of 1,600 dwellings at the Residential Park sites on Canvey Island at Sandy Bay Park and Kings Park over the local plan period. The EA raised concerns over the increased residential development on these sites, which are in Flood Zone 3, and which would not be permitted as compatible development under current Guidance as set out in table 2 of the Flood Risk and Coastal Change Planning Practice Guidance when considering the Flood Risk Vulnerability Classification of residential park homes (from Annex 2 of the NPPF).

5.3. With reference to paragraph 8.66 of the Plan, these sites have come forward under existing 50+ year old planning consents which permit the siting of caravans under the provisions of the Caravans Act 1960 and within the definition at the time this included Park Homes. The planning consents have no time constraints on development and no restrictions on whether the uses are for permanent or temporary seasonal accommodation. There is some scope under licencing of these sites to control the development of these sites. However, the local plan's ability to influence the development of these sites is limited.

5.4. The Council is keen to encourage that any dwellings on these sites are flood-resilient and has proposed the following changes to the policy to 4.a. and 4.b.

*“4. Any redevelopment of these sites will be acceptable where:*

*4.a. The risk to occupants and property from flood risk and other hazards are minimised. With residential development having regard for flood resilient design. Guidance on designing flood resilient homes can be found in [Improving the Flood Performance of New Buildings](#) and in [Building a flood resilient future](#). All proposed development seeking planning permission should be accompanied by a flood emergency plan, demonstrating the steps that will be taken to manage flood risk.*

*4.b. The overall quantum of residential development is retained, ~~or increased~~;*

## **6. Policy D6-Residential Annexes**

6.1. Policy D6 refers to provision of residential annexes within the curtilage of an existing property. EA requested within their response to the Regulation 19 consultation that additional wording should be added with regards extensions to single storey dwellings in high-risk flood areas, as residents in these types of dwellings are highly vulnerable to flood risk. For such dwellings a place of safety/refuge above the assessed level of flooding from any source must be provided as part of the extension.

6.2. EA also requested that additional wording to be added for annexes or extensions in areas at risk of flooding, that flood resistance and resilience measures should be required as part of the design in order that the development could be quickly brought back into use without significant refurbishment.

6.3. Many extensions and annexes have permitted development rights and as such do not require planning permission and consequently the Local Plan has limited influence on these types of development

*d. The design of annex or extensions should include flood resistance and/or resilience measures to allow the development to be quickly brought back to use without significant refurbishment following a flood event. For single storey dwellings, a place of safety/refuge above the assessed level of flooding from any source should be provided wherever possible.*

## **7. Modifications to the Castle Point Plan Regulation 19 Draft**

7.1. The EA through their representation to the Castle Point Plan Regulation 19 Draft identified the following modifications to the Plan.

- **Additional wording at C8 Residential Park Home Sites, Canvey Island**

*4. Any redevelopment of these sites will be acceptable where:*

*4.a. The risk to occupants and property from flood risk and other hazards are minimised. With residential development having regard for flood resilient design. Guidance on designing flood resilient homes can be found in [Improving the Flood Performance of New Buildings](#) and in [Building a flood resilient future](#). All proposed development seeking planning permission should be accompanied by a flood emergency plan, demonstrating the steps that will be taken to manage flood risk*

*4.b. The overall quantum of residential development is retained.*

- **Additional wording at D6 Residential Annexes**

*d. The design of annex or extensions should include flood resistance and/or resilience measures to allow the development to be quickly brought back to use without significant refurbishment following a flood event. For single storey dwelling, a place of safety/refuge above the assessed level of flooding from any source should be provided wherever possible.*

## **8. Areas of Agreement**

- 8.1. CPBC has worked collaboratively with EA to ensure that all environmental strategic issues have been properly considered and where appropriate reflected in the Castle Point Plan 2026-2043 and effective and ongoing joint working has and will continue to be undertaken.
- 8.2. It is agreed that CPBC and EA will continue to work in partnership with the LLFA and neighbouring coastal authorities on the Riverside Strategy to implement Thames 2100
- 8.3. It is agreed that the SFRA Level 1 and 2 has been updated to reflect the New National Flood Risk Assessment.
- 8.4. It is agreed that policy B7A and B8 has been updated to reflect the New National Flood Risk Assessment and be re-evaluated.
- 8.5. It is understood that the local plan has limited powers over the development at Residential Park Home Sites in Policy C8, due to the existing historic permissions on these sites. It is agreed that additional criteria will be added to C8 to encourage that the design of new development is resilient to flood risk.

8.6. It is understood that many annexes and extensions benefit from permitted development rights. It is agreed that additional criteria will be added to D6 to encourage all new annexes and extensions to have flood resilience designed into them.

## **9. Areas of Uncommon Ground**

9.1. Through the Duty to Cooperate, CPBC and SCC have jointly considered all environmental issues that may be impacted by the growth plans of the Castle Point Plan. There are currently no areas of uncommon ground.

## **10. Additional Strategic Matters**

10.1 There are no additional strategic matters which CPBC and EA are aware of which has not already been addressed by this Statement of Common Ground.

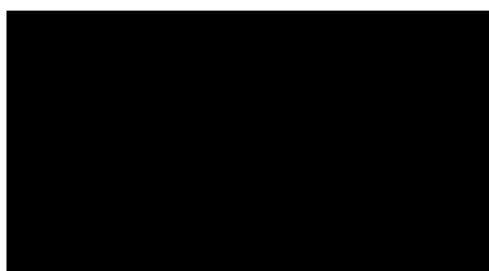
## **11 Monitoring**

11.1 This statement will be maintained by CPBC and updated as necessary.

## **12 Signatories**

12.1 The signatories agree that the Castle Point Plan has been prepared in accordance with the “Duty to Cooperate” imposed by Section 33A of the Planning and Compulsory Purchase Act 2004 in that the Council has cooperated with EA as a statutory consultee, through constructive and ongoing engagement on the impacts of sustainable development set out in the Duty Cooperate State of Compliance and that there are no outstanding strategic planning issues to be addressed.

Name:

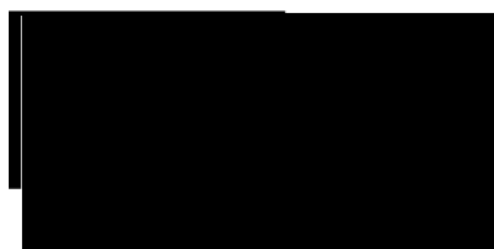


Role: Assistant Director, Climate & Growth

Date: 17 December 2025

Castle Point Borough Council

Name: Pat Abbott



Role: Planning Advisor

Date 17/12/2025

The Environment Agency



**Statement of Common Ground**

**Castle Point Plan 2026 to 2043**

**Regulation 19 Pre-Submission Draft**

**Between**

**Castle Point Borough Council**

**and**

**Rochford District Council**

**Castle Point Local Plan 2026 to 2043**

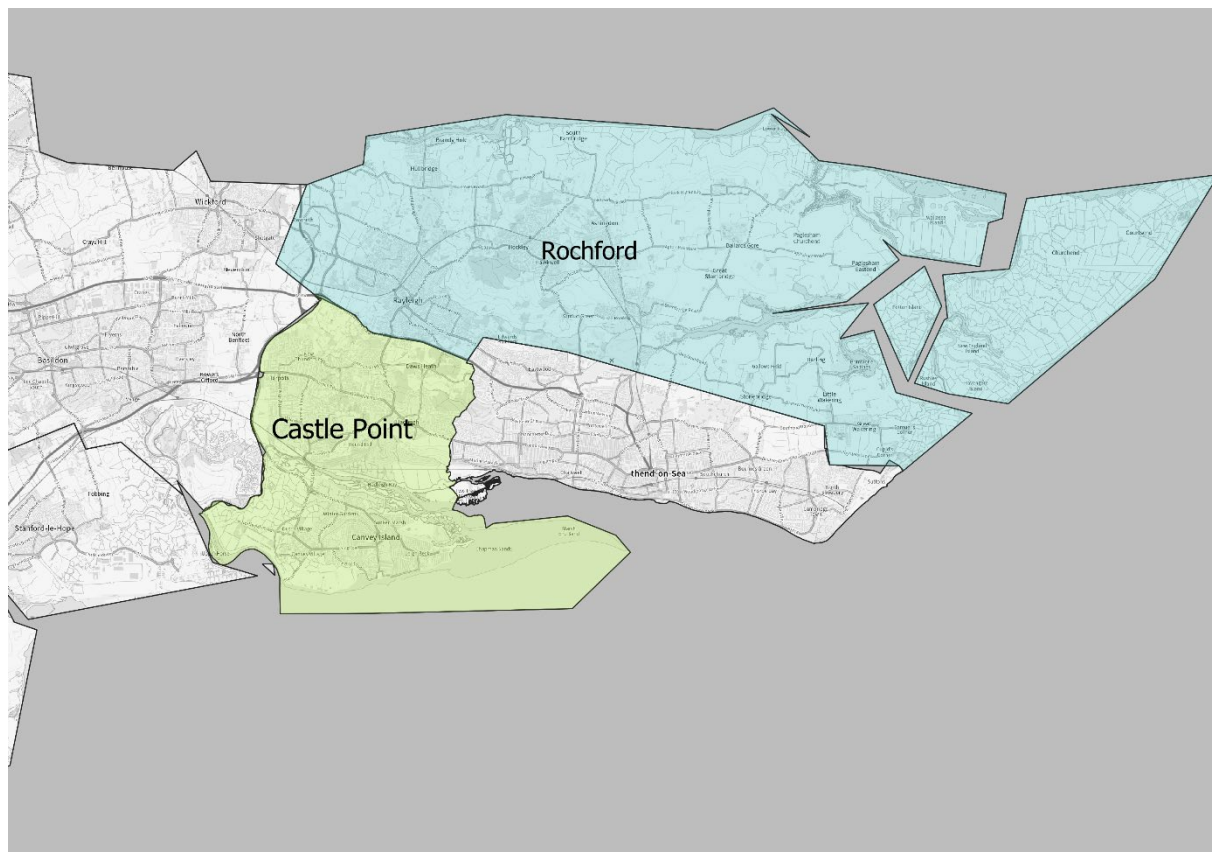
Date:

**1. Introduction**

- 1.1. This Statement of Common Ground identifies areas of agreement between Castle Point Borough Council (CPBC) and Rochford District Council (RDC) in relation to Castle Point Plan 2026-2043 and supporting evidence base.
- 1.2. This statement has been prepared to assist the examination of the Castle Point Plan. Rochford District Council made representations to Regulation 18 Consultation in issues and options and Regulation 19 Publication of the plan drafts published for consultation on 22<sup>nd</sup> July 2024 to 16<sup>th</sup> September 2024 and on 1<sup>st</sup> August 2025 to 26<sup>th</sup> September 2025 consecutively. RDC provided a response to the Regulation 19 Draft consultation on 26<sup>th</sup> September 2025. RDC confirmed their response during the Regulation 19 further consultation on 11<sup>th</sup> November 2025. RDC representations cover strategic cross boundary issues relating to:

- The proposed housing strategy and the quantum of housing delivered over the planned period.
- The site allocation evidence to support housing strategy
- Shared transport networks and the impacts of cumulative growth.
- Cross-boundary active travel routes
- The master planning of the Site THUN2
- The master planning of the Site SEL2

1.3. The map below shows the locations and administrative areas covered by this statement. Castle Point and Rochford are neighbouring authority areas in South Essex both situated on the Thames Estuary, they share an administrative boundary along A127 to the Northeast of Castle Point between the settlements of Rayleigh and Thundersley. Rochford District Council governs the settlements of Rochford, Rayleigh, Hockley, Ashingdon, Great Wakering, Canewdon and Hullbridge. Castle Point Borough Council governs the settlements of Canvey Island, Benfleet, Daws Heath, Hadleigh and Thundersley.



1.4. Essex has two tiers of local government. Essex County Council (ECC) is the upper tier authority, and is responsible for services including education,



transport, surface water flooding, libraries, waste management, minerals, and social services. ECC produces a range of strategies guiding the delivery of its services. Development contributions towards new or improved infrastructure which supports ECC services and are outlined within the ECC Developer Guide to Infrastructure Contributions (2024)<sup>1</sup>.

- 1.5. The Castle Point 1998 Adopted Local Plan forms the development plan for the Borough. The Castle Point Plan will cover the period of 2026 to 2043 and aims to grow with a focus on regeneration, brownfield redevelopment and increased density in urban areas whilst protecting its green belt and ensuring that growth is climate resilient and supported by essential infrastructure.

## **2. Duty to Cooperate**

- 2.1. The councils of Basildon, Brentwood, Castle Point, Rochford, Southend on Sea, Thurrock and Essex County Council formed a strategic partnership in 2017 to develop a long-term growth ambition which would underpin strategic spatial, infrastructure and economic priorities in South Essex. The collaboration was underpinned by a Memorandum of Understanding (MoU) signed in January 2018<sup>2</sup> creating the Association of South Essex Local Authorities (ASELA). The membership includes members from each of the six local authorities, and representatives from Essex County Council and Organisations and Business Leaders. In 2023 the leaders and Chief Executives agreed to refresh the identity for the partnership which is now known as South Essex Councils (SEC). The SEC's core purpose is to provide leadership for South Essex and to deliver a vision for the region up to 2050<sup>3</sup> in order to promote healthy growth for South Essex Communities. This is achieved through collaboration, by sharing resources, joint evidence and by lobbying government. Members and Chief Executives have also been meeting regularly throughout 2025 to discuss devolution and local government reform.

- 2.2. The SEC is supported by the South Essex Joint Officers Group which both CPBC and RDC officers attend; the group meets monthly. Through joint working, shared evidence is prepared and strategic issues along with local plan preparations are discussed.

- 2.3. At a regional level the Essex Planning Officers Association (EPOA) represents officers from all 15 local authorities in Essex including CPBC and RDC. Planning

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<sup>1</sup> [Essex County Council Developers Guide to Infrastructure Contributions 2024](#)

<sup>2</sup> [South-Essex-Joint-Strategic-Plan-Statement-of-Common-Ground-June-2018](#)

<sup>3</sup> <https://www.southessex.org.uk/opportunity-south-essex>

heads from each local authority meet several times a year to provide leadership and discuss strategic matters across all of Essex. Terms of reference including governance for this decision-making body was agreed in December 2020<sup>4</sup>.

2.4. CPBC also has one to one quarterly meetings with RDC to consider any specific cross border strategic matters, shared evidence and to appraise each other on their local plan preparation and any potential impacts.

2.5. CPBC has also collaborated with RDC on various environmental strategy documents, and these include the EPOA Planning Policy Statement- Operation Energy and Carbon (Net Zero) October 2025, and the Work of the Essex Climate Action Commission, the Essex Local Nature Recovery Strategy and the Essex Recreational Avoidance and Mitigation Strategy. All of which have been implemented across both authorities.

2.6. CPBC has fully engaged with RDC on the development of its local plan from the outset. In accordance with the Town and Country Planning (Local Planning) (England) regulations 2004, RDC has been formally consulted at each stage of consultation on the Castle Point Plan. The Duty to Cooperate Compliance Statement outlines in detail the engagement activities and outcomes together with the joint evidence base studies undertaken during the Plan's preparation and any protocols agreed which benefit strategic and cross boundary plan making.

### **3. Strategic Matters**

3.1. South Essex's proximity to London and its position on the Thames Estuary have been the major factors behind the historical growth of South Essex and these will continue to be major influences on its future growth and wider relationship with the rest of Essex. Southend Airport, the Port of Tilbury and DP World London Gateway in Thurrock and the forthcoming Lower Thames Crossing which will link Essex via Thurrock to Kent will also provide economic opportunities for the area.

3.2. As neighbouring authorities CPBC and RDC are inter- connected with the settlements of Rayleigh and Thundersley adjacent to each other only separated by the A127 Southend Arterial Road and consequently the two authorities share transport connections, economic and employment ties, education and skills,

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<sup>4</sup> [Chief Officers' Group and EPOA Partnership - Terms of Reference](#)

housing market overlaps and shared environmental interests including shared areas of Green Belt.

- 3.3. South Essex 2050 Ambition was initiated by the Association of South Essex Local Authorities (ASELA) in 2018 and furthered by South Essex Councils (SEC) and aims to build on South Essex's economic opportunities. Its objectives are to prioritise growth that provides good digital infrastructure, improved transport connectivity, enhanced green and blue infrastructure opportunities, greater commercial development and employment skills and good quality housing in the right places.
- 3.4. The Castle Point Plan's vision and objectives are in accord with the South Essex 2050 Ambition and envisages a borough where residents have good quality and affordable homes in thriving communities with access to green spaces, economic opportunities, and amenities enabling them to fulfil their potential and live happy, healthy lives.
- 3.5. Both CPBC and RDC support the vision of South Essex as described in the South Essex 2050 ambition and agree to progress this vision through their plan making.

#### **4. Infrastructure: Strategic transport connections.**

- 4.1. There is significant congestion at peak hours on the shared transport network between Castle Point and Rochford particularly peak times on the A127, A130, Rayleigh Road and the Fairglen junction which is a bottle neck for traffic along the A130 and A1245.
- 4.2. Private car is the predominant mode of transport in South Essex owing to the lack of public transport; key bus routes are frequently delayed as a result of traffic congestion and lack of priority routes; commuter trains to London from South Essex are often overcrowded including those from Benfleet and Rochford District Stations; and there is limited cycle and walking network across the sub region. The substantial growth planned for South Essex is likely to exacerbate the situation without significant improvements to transport infrastructure to support it.
- 4.3. The A127 or Southend Arterial Road provides a strategic east to west route across South Essex stretching from Southend to London Borough of Havering and is the administrative boundary between Castle Point and Rochford. It provides direct access to the M25, A130 and A13. It is not trunked and spans three highway authorities and five local planning authorities. The route already

experiences significant capacity issues, particularly at key junctions such as Fairglens Interchange a crucial link at Benfleet connecting the A127 to A130 for Chelmsford and Canvey Island and the Rayleigh Weir Interchange which connects A127 to A129 Rayleigh to Hadleigh.

- 4.4. Junction Modelling has been included in the Transport Assessment report and assessed the likely impacts of Castle Point's planned growth on the surrounding highway network. This included a high-level analysis of cross boundary traffic flows on key highway links including A13/London Road, A127, Rayleigh Weir Interchange and Fairglens Interchange. Further transport assessments will be carried out as housing allocations come forward during the local plan period.
- 4.5. RDC and the other South Essex Local Authorities are currently preparing their local plans and developing their housing strategies to accommodate the expected significant growth across South Essex. As these local plans come forward, their transport assessments will add to the evidence and provide greater granular detail of the impact of this cumulative growth on the transport network.
- 4.6. CPBC and RDC agree to work collaboratively with all South Essex authorities on their transport assessments including Essex County's work on the LTP4.
- 4.7. Essex County Council is the local Highways and Transportation Authority and is responsible for local transport planning and the provision and maintenance of the highway network, as well as preparing the Local Transport Plan. This is currently being updated to LTP4 with the collaboration of all Essex authorities. Essex is currently entering a transitional phase, with the election of a Mayor for Greater Essex and changes to local government structures as a result of devolution and local government reorganisation, but Essex County Council with the collaboration of Essex authorities including CPBC and RDC are finalising the preparation of LTP4 to support the new structures once they are in place as well as guide the development in emerging local plans.
- 4.8. The SEC authorities and London Borough of Havering have prepared a statement of common ground<sup>5</sup> with regards to the issues for sustainable growth and plan making that the A127 Transport Corridor presents. The Highway Authorities are also developing a joint Implementation Plan as part of the A127 Corridor for Growth (The Route Management Strategy) and along with the A127 Corridor Engagement Group are making the case for the A127 to be re-adopted as a trunk road.<sup>6</sup>

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<sup>5</sup> [DUT006 Statement of Common Ground on A127 Strategic Transport Issues.pdf](#)

<sup>6</sup> [A127 Economic Growth Corridor | Essex County Council](#)

- 4.9. The A127/A130 Fairglen Interchange lies at a key point on the transport network for South Essex, forming a strategic connection between the A13, A127, A130 and A1245 and experiences severe congestion. Improvements for this interchange has been given the green light with investment funding from Central Government, Essex County Council and Southeast Local Enterprise Partnerships to provide improvements which are expected to be in place by 2027
- 4.10 The Rayleigh Weir Interchange is also a key point along the A127 for both CPBC and RDC. The Southeast Local Enterprise Partnership has proposed under the A127 Network Resilience plan to upgrade traffic signals and improve linkage through a split cycle offset optimisation technique (SCOOT) to prevent vehicles from backing up onto the A127.
- 4.11. Both CPBC and RDC support and are actively involved in these initiatives for improvements to the A127, the Fairglen Interchange and the Rayleigh Weir Interchange. Both Councils agree to have regard for the Local Transport Plan within their local plans.
- 4.12 CPBC and RDC agree to continue to work collaboratively to mitigate cumulative impact of their growth plans on the shared transport routes. Both Councils also agree to work collaboratively with relevant organisations and neighbouring authorities to ensure that the necessary infrastructure is in place to support the growth needs set out in their Local Plans.
- 4.13 The Castle Point Plan promotes active travel in policy T3 which requires all new development to prioritise active travel routes. It is known that the South Essex cycling network has gaps particularly along the north/south route and there is a lack of comprehensive overall network. To address issues around cycle and pedestrian route provision Essex County Council has worked with South Essex Local Authorities to prepare local cycle and walking routes to provide better active travel connections. The Castle Point Local Cycling and Walking Infrastructure Plan July 2025<sup>7</sup> has identified potential cycle and walking routes between Thundersley and Rayleigh, and Hadleigh and Rayleigh. Rochford has recently published its Local Cycle and Walking Infrastructure Plan July 2025 with these proposed routes as well.
- 4.14 CPBC agrees to collaborate with RDC to progress work on shared cycle and pedestrian routes between their authority areas.

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<sup>7</sup> [Summary of Castle Point cycling and walking plans](#)

## 5 Housing Need

- 5.1 In December 2024, the government introduced changes to the NPPF along with changes to the standard methodology for calculating housing need, from this the government set annual housing delivery targets which will require local authorities to plan for significantly more housing within the South Essex area.
- 5.2 The Standard Method Housing Need for CPBC over the planned period of 2026-2043 is 11,662, which equates to an average of 686 dwellings per annum. The annual housing delivery for Castle Point averages at 100 dwellings per annum. Castle Point is 17.4 square miles in size with a population density of 4,976 per square mile. Over half of the borough is designated Green Belt and most of the borough is low lying land below sea level resulting in 45% of it in flood zone 3.
- 5.3 RDC agrees that Castle Point faces notable physical constraints including size, density and transport issues and environmental constraints with a substantial proportion of land designated as Green Belt and a significant proportion falling within Flood Risk Zone 3
- 5.4 CPBC has commissioned various pieces of work to review land availability throughout the Local Plan Making process including earlier work on Strategic Land Availability and Urban Capacity January 2023 and the Borough wide development options and technical paper July 2024 which identified land availability outside of Green Belt and through density modelling and site identification looked at the most effective use of this land for development. CPBC have also prepared a Green Belt Assessment July 2025<sup>8</sup> as guided by the NPPF to identify potential Grey Belt sites for development. Identified sites were reviewed against further criteria: designated habitat and heritage sites; flood risk zones; transport restraints e.g. access issues or requirements for significant upgrades on highways impacting viability; and sustainability criteria. This work has been described in the Housing Capacity Topic paper July 2025<sup>9</sup>. CPBC also prepared the Strategic Land Availability Assessment July 2025<sup>10</sup> and Site Assessments for Canvey Island<sup>11</sup>, Benfleet, Hadleigh, Thundersley and Daws Heath<sup>12</sup> July 2025. The approach to site assessments is further supported by the Sustainability Appraisal July 2025.<sup>13</sup>

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<sup>8</sup> [Castle Point Green Belt Assessment July 2025](#)

<sup>9</sup> [Housing Capacity Topic Paper August 2025](#)

<sup>10</sup> [Strategic Land Availability Assessment July 2025](#)

<sup>11</sup> [Strategic Land Availability Site Assessment Canvey Island July 2025](#)

<sup>12</sup> [Strategic Land Availability Site Assessment Benfleet, Thundersley, Hadleigh, Daws Heath July 2025](#)

<sup>13</sup> [Sustainability Appraisal Main Report July 2025](#)

- 5.5 The Sustainability Appraisal objectively assessed alternative growth scenarios including one which would meet the Standard Methodology Housing Need. Objective 14 considered which scenario would provide appropriate housing and accommodation to meet future and existing needs of the whole community. Its conclusion was that as the local Housing Needs Assessment 2023 identified an Objectively Assessed Need (OAN) of 255 per annum for Castle Point, 197 of which are derived from the 10-year migration trend, the Castle Point Plan would meet the OAN figure in full and the 10-year migration trend allowance and would therefore be a positive. The higher Standard Methodology Housing Need would provide no additional benefits in terms of meeting the needs of the community i.e. Castle Point.
- 5.6 CPBC has considered what housing delivery can be realistically achieved within its boundaries taking into account its significant environmental and infrastructure restraints as well as its market capacity. The evidence from the Green Belt Assessment, Strategic Land Availability Assessments, Housing Topic Paper and the recently finalised Porter Planning Economics Castle Point Housing Delivery Technical Note has identified that CPBC has the capacity to deliver 6,196 homes through the planned period.
- 5.7 CPBC realises that the Castle Point Plan delivers considerably less housing than the Standard Method Housing Need but considers based on the evidence that this is a realistic housing delivery.
- 5.8 CPBC and RDC agree that the Castle Point Plan is proposing a lower housing delivery than the Standard Method Housing Need.

## **6 Meeting Unmet Housing Need**

- 6.1 Following the revised NPPF 2024 and the introduction of the new standard methodology for calculating housing need, CPBC contacted its neighbouring authorities including RDC in January and February 2025 to assist with meeting the newly calculated housing need. This was in accordance with the Essex Planning Officer's Association (EPOA) Unmet Housing Need Protocol. All responded with the view including RDC that at the time they could not offer any assistance in meeting CPBC's unmet housing needs.

- 6.2 RDC agrees that CPBC has followed the EPOA Unmet Housing Need protocol to address its unmet housing need.
- 6.3 CPBC is working through the South Essex Joint Officers Group and the members group to try to address their unmet housing need. Part of this work includes reviewing the EPOA mechanism for considering unmet housing need established in 2017 and providing a shared joint position statement on the housing need within South Essex.
- 6.4 Both CPBC and RDC agree to continue to work collaboratively through SEC to address CPBC and other authority areas' unmet housing need within South Essex.

## **7 THUN2**

- 7.1 The Castle Point Plan proposes to redevelop the Kiln Road Campus to provide for new and enhanced facilities, a new local shopping parade and at least 730 new homes. A master plan will guide the development of the scheme at Kiln Road and the current community and educational uses of Runnymede Leisure Centre. SEEVIC (USP) College will either be re-designed on site or provided for on an alternative site. The College and Leisure Centre are also used by RDC residents and RDC is keen to ensure that these facilities are not lost during or after the development.
- 7.2 CPBC agrees to engage with RDC in the master planning work for this site to ensure that shared infrastructure is appropriately considered, and that impact of redevelopment is minimised on the education and community uses

## **8 HOU6 Gypsy and Traveller Accommodation**

- 8.1 CPBC has accommodated for all of its Gypsy and Traveller Pitch need through the intensification of pitches at Orchard Place and Janda Fields. The EPOA Policy Forum is currently conducting a study into the transit site requirements within Essex.
- 8.2 CPBC and RDC support the work of the EPOA programme and agree to work together with all Essex Councils on the transit site requirements within Essex County.

## **9 E1 and E2 Employment and Economic Requirements**

- 9.1 CPBC proposes the redevelopment and redesign of some employment sites to make more effective use of land, this includes SEL2 Stadium Way at Rayleigh Weir which is in close proximity to Rayleigh and has the potential to provide benefits to Rochford Economy.



9.2 CPBC agrees to engage with RDC in the master planning work for this site

## **10 Modifications to Castle Point Plan Regulation 19 Draft**

10.1 RDC through their representation to the Castle Point Plan Regulation 19 Draft, identified one potential modification to the Plan. This is set out below and resolves the representations from RDC. The modification in this SoCG is also included in the Council's Modification Schedule.

- Correction to the Castle Point interactive mapping location of the ancient woodland area Kingley Wood which is in Rochford District.

## **11 Areas of Agreement**

11.1 CPBC has worked collaboratively with RDC to ensure that all cross boundary strategic issues have been properly considered and where appropriate reflected in the Castle Point Plan 2026 to 2043 and effective and ongoing joint working has and will continue to be undertaken.

11.2 It is agreed that CPBC and RDC will continue to work through the South Essex Council (SEC), Essex Planning Officers Association (EPOA) at member and officer level to address strategic issues across the Essex region and subregion of South Essex.

11.3 It is agreed that the Castle Point Plan 2026-2043 does not allocate sufficient sites to meet the Standard Methodology Housing Need for housing at this time. It is agreed that there are significant environmental, physical and infrastructure constraints which impact delivery of the housing need in Castle Point.

11.4 It is agreed that both CPBC and RDC will collaborate through their local plan making to consider the impact of the cumulative growth across South Essex on the transport network.

11.5 It is agreed that infrastructure requirements to support the growth in South Essex needs to be carefully and collaboratively considered. Both CPBC and RDC agree to work collaboratively to address the cumulative impact of their growth plans on shared highways and with all relevant organisations and neighbouring authorities to enable growth.

11.6 It is agreed that both CPBC and RDC will work collaboratively to develop the cross-boundary walking and cycling routes across both authority areas in accordance with the Local Cycling and Walking Infrastructure Plans.

- 11.7 It is agreed the CPBC and RDC will collaborate on the master planning of the Kiln Road campus site THUN2 and Stadium Way SEL2

## **12 Areas of Uncommon Ground**

- 12.1 Through the Duty to Cooperate, CPBC and RDC have jointly considered issues relating to housing, gypsy and traveller needs, jobs and employment, retail and tourism, natural environment, strategic site allocations and the sustainability appraisal. There are currently no areas of uncommon ground in relation to these topics.

## **13 Additional Strategic Matters**

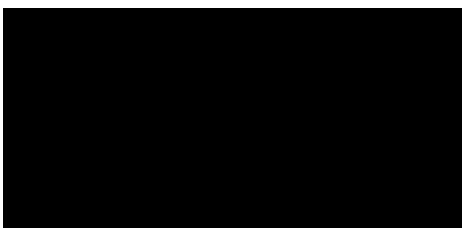
- 13.1 There are no additional strategic matters which CPBC and RDC are aware of which has not already been addressed by this Statement of Common Ground.

## **14 Monitoring**

- 14.1 This statement will be maintained by CPBC and updated as necessary.

## **15 Signatories**

- 15.1 The signatories agree that the Castle Point Plan has been prepared in accordance with the “Duty to Cooperate” imposed by Section 33A of the Planning and Compulsory Purchase Act 2004 in that the Council has cooperated with RDC as a neighbouring authority, through constructive and ongoing engagement on the impacts of sustainable development set out in the Duty Cooperate State of Compliance and that there are no outstanding strategic planning issues to be addressed.

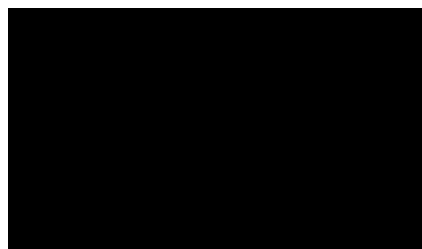


Name: Amanda Parrott

Position: Assistant Director, Climate & Growth

Date: 5 December 2025

Castle Point Borough Council



Name: Emma Goodings

Position: Director of Place

Date: 05/12/25

Rochford District Council



**Statement of Common Ground**

**Castle Point Plan 2026 to 2043**

**Regulation 19 Pre-Submission Draft**

**Between**

**Castle Point Borough Council**

**and**

**Brentwood Borough Council**

**Castle Point Local Plan 2026 to 2043**

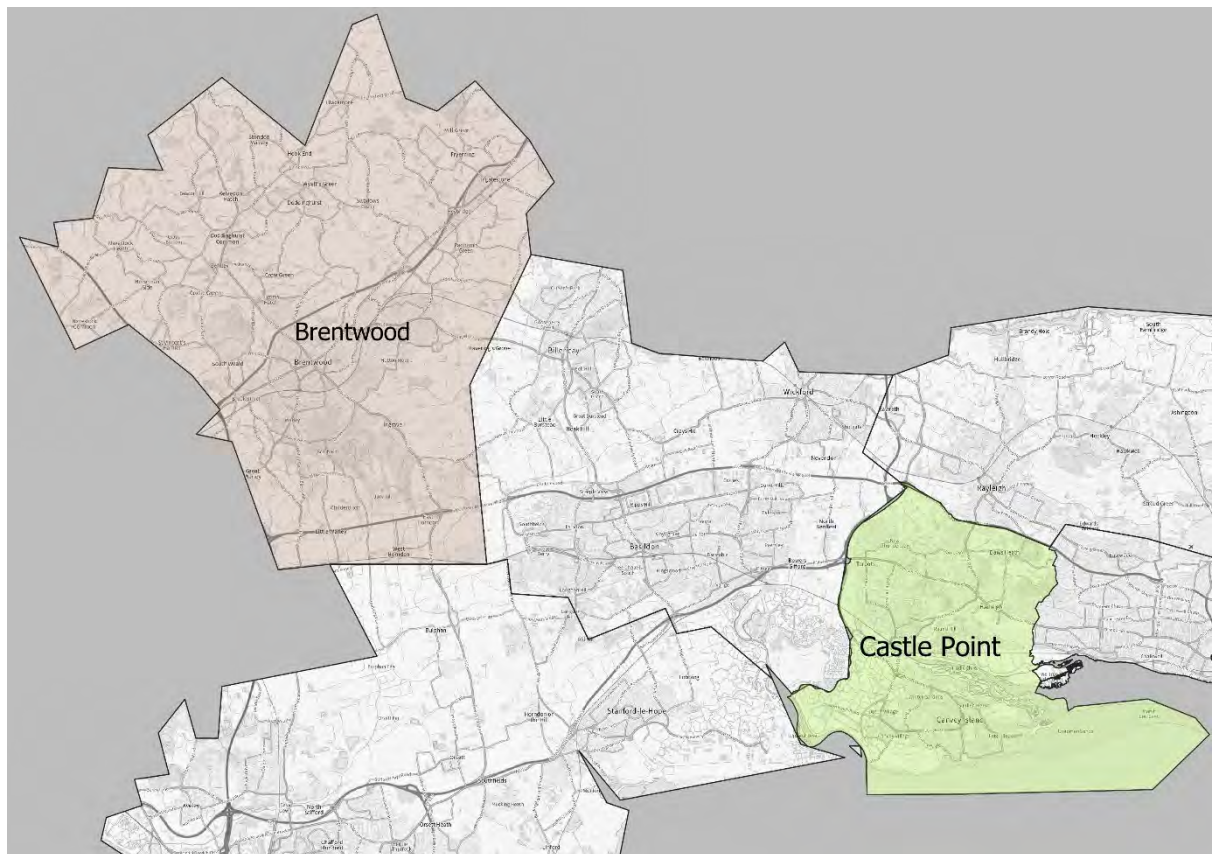
Date:

**1. Introduction**

- 1.1. This Statement of Common Ground identifies areas of agreement between Castle Point Borough Council (CPBC) and Brentwood Borough Council (BBC) in relation to Castle Point Plan 2026-2043 and supporting evidence base.
- 1.2. This statement has been prepared to assist the examination of the Castle Point Plan. Brentwood Borough Council made representations to Regulation 18 Consultation in issues and options and Regulation 19 Publication of the plan drafts published for consultation on 22<sup>nd</sup> July 2024 to 16<sup>th</sup> September 2024 and on 1<sup>st</sup> August 2025 to 26<sup>th</sup> September 2025 consecutively. BBC confirmed their response during the Regulation 19 further consultation on 11<sup>th</sup> November 2025. BBC representations cover strategic cross boundary issues relating to:
  - The proposed housing strategy and the quantum of housing delivered over the planned period.

- The site allocation evidence to support housing strategy
- Shared transport networks and the impacts of cumulative growth.

1.3. The map below shows the locations and administrative areas covered by this statement. Castle Point and Brentwood are not neighbouring authorities but in the same functional housing market area in South Essex. Brentwood is situated 15 miles to the Northeast of Castle Point, only 20 miles from London with the M25 running along its boundary. The main settlement within Brentwood Borough is Brentwood itself followed by Shenfield, there are a number of smaller settlements as well. The planned garden village for 4000 dwellings of Dunton Hills is located near the A127 within Brentwood Borough. Castle Point Borough Council governs the settlements of Canvey Island, Benfleet, Daws Heath, Hadleigh and Thundersley.



1.4. Essex has two tiers of local government. Essex County Council (ECC) is the upper tier authority, and is responsible for services including education, transport, surface water flooding, libraries, waste management, minerals, and social services. ECC produces a range of strategies guiding the delivery of its services. Development contributions towards new or improved infrastructure which

supports ECC services and are outlined within the ECC Developer Guide to Infrastructure Contributions (2024)<sup>1</sup>.

- 1.5. The Castle Point 1998 Adopted Local Plan forms the development plan for the Borough. The Castle Point Plan will cover the period of 2026 to 2043 and aims to grow with a focus on regeneration, brownfield redevelopment and increased density in urban areas whilst protecting its green belt and ensuring that growth is climate resilient and supported by essential infrastructure.

## **2. Duty to Cooperate**

2.1. The councils of Basildon, Brentwood, Castle Point, Rochford, Southend on Sea, Thurrock and Essex County Council formed a strategic partnership in 2017 to develop a long-term growth ambition which would underpin strategic spatial, infrastructure and economic priorities in South Essex. The collaboration was underpinned by a Memorandum of Understanding (MoU) signed in January 2018<sup>2</sup> creating the Association of South Essex Local Authorities (ASELA). The membership includes members from each of the six local authorities, representatives from Essex County Council, Organisations and Business Leaders. In 2023 the leaders and Chief Executives agreed to refresh the identity for the partnership which is now known as the South Essex Councils (SEC). The SEC's core purpose is to provide leadership for South Essex and to deliver a vision for the region up to 2050<sup>3</sup> in order to promote healthy growth for South Essex Communities. This is achieved through collaboration, by sharing resources, joint evidence and by lobbying government. Members and Chief Executives have also been meeting regularly throughout 2025 to discuss devolution and local government reform.

2.2. The SEC is supported by the South Essex Joint Officers Group which both CPBC and BBC officers attend; the group meets monthly. Through joint working, shared evidence is prepared and strategic issues along with local plan preparations are discussed.

2.3. At a regional level the Essex Planning Officers Association (EPOA) represents officers from all 15 local authorities in Essex including CPBC and BBC. Planning heads from each local authority meet several times a year to provide leadership

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<sup>1</sup> [Essex County Council Developers Guide to Infrastructure Contributions 2024](#)

<sup>2</sup> [South-Essex-Joint-Strategic-Plan-Statement-of-Common-Ground-June-2018](#)

<sup>3</sup> <https://www.southessex.org.uk/opportunity-south-essex>

and discuss strategic matters across all of Essex. Terms of reference including governance for this decision-making body was agreed in December 2020<sup>4</sup>.

- 2.4. CPBC also has one to one quarterly meetings with BBC to consider any specific shared strategic matters, shared evidence and to appraise each other on their local plan preparation and any potential impacts.
- 2.5. CPBC has also collaborated with BBC on various environmental strategy documents, and these include the EPOA Planning Policy Statement- Operation Energy and Carbon (Net Zero) October 2025, and the Work of the Essex Climate Action Commission, the Essex Local Nature Recovery Strategy and the Essex Recreational Avoidance and Mitigation Strategy. All of which have been implemented across both authorities.
- 2.6. CPBC has fully engaged with BBC on the development of its local plan from the outset. In accordance with the Town and Country Planning (Local Planning) (England) regulations 2004, BBC has been formally consulted at each stage of consultation on the Castle Point Plan. The Duty to Cooperate Compliance Statement outlines in detail the engagement activities and outcomes together with the joint evidence base studies undertaken during the Plan's preparation and any protocols agreed which benefit strategic and cross boundary plan making.

### **3. Strategic Matters**

- 3.1. South Essex's proximity to London and its position on the Thames Estuary have been the major factors behind the historical growth of South Essex and these will continue to be major influences on its future growth and wider relationship with the rest of Essex. Southend Airport, the Port of Tilbury and DP World London Gateway in Thurrock and the forthcoming Lower Thames Crossing which will link Essex via Thurrock to Kent will also provide economic opportunities for the area.
- 3.2. As authorities within the same functional housing market area CPBC and BBC have shared interests particularly around highways, the economy and housing needs.
- 3.3. South Essex 2050 Ambition was initiated by the Association of South Essex Local Authorities (ASELA) in 2018 and furthered by South Essex Councils (SEC) and aims to build on South Essex's economic opportunities. Its objectives are to prioritise growth that provides good digital infrastructure, improved transport connectivity,

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<sup>4</sup> [Chief Officers' Group and EPOA Partnership - Terms of Reference](#)

enhanced green and blue infrastructure opportunities, greater commercial development and employment skills and good quality housing in the right places.

3.4. The Castle Point Plan's vision and objectives are in accord with the South Essex 2050 Ambition and envisages a borough where residents have good quality and affordable homes in thriving communities with access to green spaces, economic opportunities, and amenities enabling them to fulfil their potential and live happy, healthy lives.

3.5. Both CPBC and BBC support the vision of South Essex as described in the South Essex 2050 ambition and agree to progress this vision through their plan making.

#### **4. Infrastructure: Strategic transport connections.**

4.1. There is significant congestion along the entire transport network within South Essex particularly the A127 which is the main shared route between Castle Point and Brentwood, however, the capacity issues of the surrounding roads in South Essex e.g. A130, A12 also impact both authority areas in causing unreliable journey times and slower than average speeds.

4.2. The A127 or Southend Arterial Road provides a strategic east to west route across South Essex stretching from Southend to London Borough of Havering through Brentwood joining the M25. It is not trunked and spans three highway authorities and five local planning authorities and the route already experiences significant capacity issues particularly at M25 junctions 28 and 29 in Brentwood and Fairglen junction in Castle Point.

4.3. Junction modelling has been included in the Transport Assessment report and assessed the likely impacts of Castle Point's planned growth on the surrounding highway network. This included a high-level analysis of cross boundary traffic flows on key highway links along the A127. Further transport assessments will be carried out as housing allocations come forward during the local plan period.

4.4. BBC and the other South Essex Local Authorities are currently preparing their local plans and developing their housing strategies to accommodate the expected significant growth across South Essex. As these local plans come forward, their transport assessments will add to the evidence and provide greater granular detail of the impact of this cumulative growth on the transport network.

4.5. Essex County Council is the local Highways and Transportation Authority and is responsible for local transport planning and the provision and maintenance of the highway network, as well as preparing the Local Transport Plan. This is currently

being updated to LTP4 with the collaboration of all Essex authorities. Essex is currently entering a transitional phase, with the election of a Mayor for Greater Essex and changes to local government structures as a result of devolution and local government reorganisation, but Essex County Council with the collaboration of Essex authorities including CPBC and BBC are finalising the preparation of LTP4 to support the new structures once they are in place as well as guide the development in emerging local plans.

4.6. CPBC and BBC agree to work collaboratively with all South Essex authorities on their transport assessments including Essex County's work on the LTP4.

4.7. The SEC authorities and London Borough of Havering have prepared a statement of common ground<sup>5</sup> with regards to the issues for sustainable growth and plan making that the A127 Transport Corridor presents. The Highway Authorities are also developing a joint Implementation Plan as part of the A127 Corridor for Growth (The Route Management Strategy) and along with the A127 Corridor Engagement Group are making the case for the A127 to be re-adopted as a trunk road.<sup>6</sup>

4.8. Improvements are planned for both the M25/A127 junction and the wider A127 corridor. The M25 Junction 28 project has just been open and provides a loop road which connects the anticlockwise M25 with the A12 eastbound at Junction 28. Additional funding has been provided for the A122 Lower Thames Crossing which would connect the A2 and M2 in Kent to the A13 in Thurrock and junction 29 of the M25 in the London Borough of Havering. The A127 Corridor for Growth project provides for a broader package of improvements which includes realigning the Fortune of War Junction near Basildon. Improvements to the Fairglen Interchange have received investment funding from Central Government, Essex County Council and Southeast Local Enterprise Partnerships to provide improvements which are expected to be in place by 2027

4.9. Both CPBC and BBC support and are actively involved in these initiatives for improvements to the A127 and surrounding interconnected highway routes which are served by or feed into it. Both Councils agree to have regard for the Local Transport Plan within their local plans.

4.10. The Castle Point Plan also promotes active travel within its policy T3 which requires all new development to prioritise active travel routes to reduce the amount of private car usage across its authority area.

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<sup>5</sup> [DUT006 Statement of Common Ground on A127 Strategic Transport Issues.pdf](#)

<sup>6</sup> [A127 Economic Growth Corridor | Essex County Council](#)



- 4.11. CPBC and BBC agree to continue to work collaboratively to mitigate cumulative impact of their growth plans on the shared transport routes. Both Councils also agree to work collaboratively with relevant organisations and neighbouring authorities to ensure that the necessary infrastructure is in place to support the growth needs set out in their Local Plans.

## **5. Housing Need**

- 5.1. In December 2024, the government introduced changes to the NPPF along with changes to the standard methodology for calculating housing need, from this the government set annual housing delivery targets which will require local authorities to plan for significantly more housing within the South Essex area.
- 5.2. The Standard Method Housing Need for CPBC over the planned period of 2026-2043 is 11,662, which equates to an average of 686 dwellings per annum. The annual housing delivery for Castle Point averages at 100 dwellings per annum. Castle Point is 17.4 square miles in size with a population density of 4.976 per square mile. Over half of the borough is designated Green Belt and the majority of the borough is low lying land below sea level resulting in 45% of it in flood zone 3.
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Benfleet, Hadleigh, Thundersley and Daws Heath<sup>11</sup> July 2025. The approach to site assessments is further supported by the Sustainability Appraisal July 2025.<sup>12</sup>

- 5.5. The Sustainability Appraisal objectively assessed alternative growth scenarios including one which would meet the Standard Methodology Housing Need. Objective 14 considered which scenario would provide appropriate housing and accommodation to meet future and existing needs of the whole community. Its conclusion was that as the local Housing Needs Assessment 2023 identified an Objectively Assessed Need (OAN) of 255 per annum for Castle Point, 197 of which are derived from the 10-year migration trend, the Castle Point Plan would meet the OAN figure in full and the 10-year migration trend allowance and would therefore be a positive. The higher Standard Methodology Housing Need would provide no additional benefits in terms of meeting the needs of the community i.e. Castle Point.
- 5.6. CPBC has considered what housing delivery can be realistically achieved within its boundaries taking into account its significant environmental and infrastructure restraints as well as its market capacity. The evidence from the Green Belt Assessment, Strategic Land Availability Assessments, Housing Topic Paper and the recently finalised Porter Planning Economics Castle Point Housing Delivery Technical Note has identified that CPBC has the capacity to deliver 6,196 homes through the planned period.
- 5.7. The CPBC realises that the Castle Point Plan delivers considerably less housing than the Standard Method Housing Need but considers based on the evidence that this is a realistic housing delivery.
- 5.8. CPBC and BBC agree that the Castle Point Plan is proposing a lower housing delivery than the Stand Method Housing Need.

## **6. Meeting Unmet Housing Need**

- 6.1. Following the revised NPPF 2024 and the introduction of the new standard methodology for calculating housing need, CPBC contacted its neighbouring authorities including BBC in January and February 2025 to assist with meeting the newly calculated housing need. This was in accordance with the Essex Planning Officer's Association (EPOA) Unmet Housing Need Protocol 2017. All responded

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<sup>11</sup> [Strategic Land Availability Site Assessment Benfleet, Thundersley, Hadleigh, Daws Heath July 2025](#)

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with the view including BBC that at the time they could not offer any assistance in meeting CPBC's unmet housing needs.

- 6.2. BBC agrees that CPBC has followed the EPOA Unmet Housing Need protocol to address its unmet housing need.
- 6.3. CPBC is working through the South Essex Joint Officers Group to try to address their unmet housing need. Part of this work includes reviewing the EPOA mechanism for considering unmet housing need established in 2017 and providing a shared joint position statement on the housing need within South Essex.
- 6.4. Both CPBC and BBC agree to continue to work collaboratively through SEC to address CPBC and other authority areas' unmet housing need within South Essex.

## **7. HOU6 Gypsy and Traveller Accommodation**

- 7.1. CPBC has accommodated for all its Gypsy and Traveller Pitch need through the intensification of pitches at Orchard Place and Janda Fields. The EPOA programme is currently conducting a study into the transit site requirements within Essex.
- 7.2. CPBC and BBC support the work of the EPOA programme and will work with all Essex Councils on the transit site requirements within Essex County.

## **8. Modifications to Castle Point Plan Regulation 19 Draft**

- 8.1. BBC through their representations to the Castle Point Plan Regulation 19 Draft, did not identify any modifications to the Plan.

## **9. Areas of Agreement**

- 9.1. CPBC has worked collaboratively with BBC to ensure that all cross boundary strategic issues have been properly considered and where appropriate reflected in the Castle Point Plan 2026 to 2043 and effective and ongoing joint working has and will continue to be undertaken
- 9.2. It is agreed that CPBC and BBC will continue to work through the South Essex Council, Essex Planning Officers Association at member and officer level to address strategic issues across the Essex region and subregion of South Essex
- 9.3. It is agreed that the Castle Point Plan 2026-2043 does not allocate sufficient sites to meet the Standard Methodology Housing Need for housing at this time. It is agreed that there are significant environmental, physical and infrastructure constraints which impact delivery of the housing need in Castle Point.

- 9.4. It is agreed that both CPBC and BBC will collaborate through their local plan making to consider the impact of the cumulative growth across South Essex on the transport network.

## **10. Areas of Uncommon Ground**

- 10.1. Through the Duty to Cooperate, CPBC and BBC have jointly considered issues relating to housing, gypsy and traveller needs, jobs and employment, retail and tourism, natural environment, strategic site allocations and the sustainability appraisal. There are currently no areas of uncommon ground in relation to these topics.

## **11. Additional Strategic Matters**

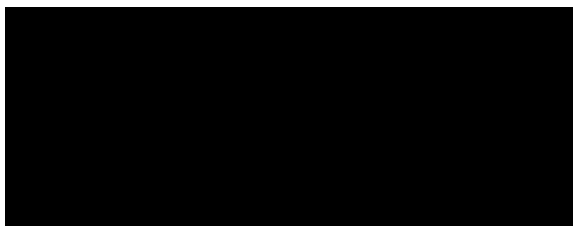
- 11.1. There are no additional strategic matters which CPBC and BBC are aware of which has not already been addressed by this Statement of Common Ground.

## **12. Monitoring**

- 12.1. This statement will be maintained by CPBC and updated as necessary.

## **13. Signatories**

- 13.1. The signatories agree that the Castle Point Plan has been prepared in accordance with the “Duty to Cooperate” imposed by Section 33A of the Planning and Compulsory Purchase Act 2004 in that the Council has cooperated with BBC as a neighbouring authority, through constructive and ongoing engagement on the impacts of sustainable development set out in the Duty Cooperate State of Compliance and that there are no outstanding strategic planning issues to be addressed.

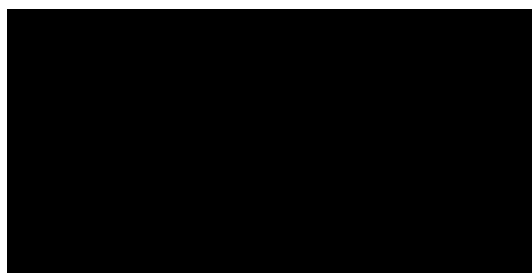


Name: Amanda Parrott

Position: Assistant Director, Climate & Growth

Date: 5 December 2025

Castle Point Borough Council



Name: Emma Goodings

Position: Director of Place

Date: 05/12/25

Brentwood Borough Council



**Statement of Common Ground**

**Castle Point Plan 2026 to 2043**

**Regulation 19 Pre-Submission Draft**

-  
**Between**

-  
**Castle Point Borough Council**

**and**

**Southend on Sea Council**

**Castle Point Local Plan 2026 to 2043**

Date: 5<sup>th</sup> December 2025

## **1. Introduction**

1.1. This Statement of Common Ground identifies areas of agreement between Castle Point Borough Council (CPBC) and Southend-on-Sea City Council (SCC) in relation to Castle Point Plan 2026-2043 and supporting evidence base. There are no outstanding areas of disagreement.

1.2. This statement has been prepared to assist the examination of the Castle Point Plan. Southend- on- Sea Council made representations to Regulation 18 Consultation in issues and options and Regulation 19 Publication of the plan drafts published for consultation on 22<sup>nd</sup> July 2024 to 16<sup>th</sup> September 2024 and on 1<sup>st</sup> August 2025 to 26<sup>th</sup> September 2025 consecutively. SCC confirmed their response to the Regulation 19 Draft during the further consultation on 10<sup>th</sup> November 2025. SCC representations cover strategic cross boundary issues relating to:

1.2.1. The Vision and Objectives

1.2.2. Strategic Transport Connections

1.2.3. Housing Need SP2 and Housing Strategy SP3

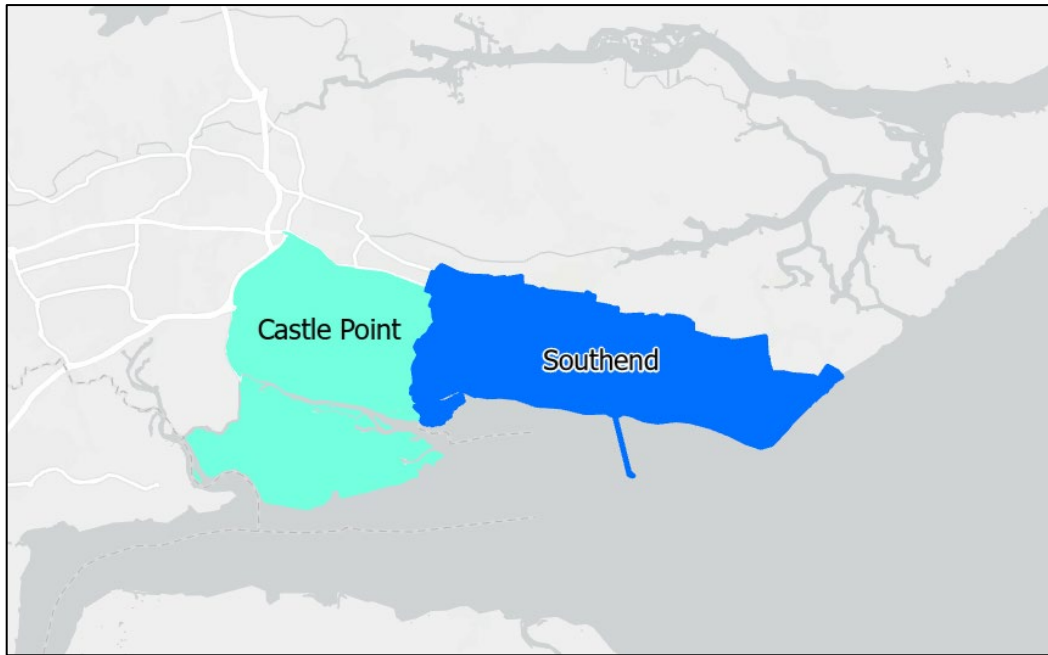
1.2.4. Environmental Policies ENV2 & ENV3 relating to Climate Change, Flooding, Essex LNRS and RAMS

1.2.5. Strategic transport connections

1.2.6. Green belt assessment

1.2.7. Growth along London Road

1.3. The map below shows the locations and administrative areas covered by this statement. Castle Point and Southend-on-Sea are neighbouring coastal areas in South Essex situated on the North bank of the Thames Estuary, they share an administrative boundary to the east of Castle Point. Southend-on-Sea is a coastal city and unitary authority, while Castle Point Borough Council governs the settlements of Canvey Island, Benfleet, Hadleigh and Thundersley.



1.4. The Castle Point 1998 Adopted Local Plan forms the development plan for the Borough. The Castle Point Plan will cover the period of 2026 to 2043 and aims to achieve growth through focusing on regeneration, brownfield redevelopment and increased density in urban areas whilst protecting its green belt and ensuring that growth is climate resilient and supported by essential infrastructure.

## **2. Duty to Cooperate**

2.1. The councils of Basildon, Brentwood, Castle Point, Rochford, Southend on Sea, Thurrock and Essex County Council formed a strategic partnership in 2017 to develop a long-term growth ambition which would underpin strategic spatial, infrastructure and economic priorities in South Essex. The collaboration was underpinned by a Memorandum of Understanding (MoU) signed in January 2018<sup>1</sup> creating the Association of South Essex Local Authorities (ASELA). In 2023 the leaders and Chief Executives agreed to refresh the identity for the partnership which is now known as South Essex Councils (SEC). The SEC's core purpose is to provide leadership for South Essex and to deliver a vision for the region up to 2050<sup>2</sup> in order to promote healthy growth for South Essex Communities. This is achieved through collaboration, by sharing resources, joint evidence and by lobbying government.

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<sup>1</sup> [https://www.basildon.gov.uk/media/8838/South-Essex-Joint-Strategic-Plan-Statement-of-Common-Ground-June-2018/pdf/South\\_Essex\\_Joint\\_Strategic\\_Plan\\_-\\_Statement\\_of\\_Common\\_Ground\\_-\\_June\\_2018.pdf?m=1545315901647](https://www.basildon.gov.uk/media/8838/South-Essex-Joint-Strategic-Plan-Statement-of-Common-Ground-June-2018/pdf/South_Essex_Joint_Strategic_Plan_-_Statement_of_Common_Ground_-_June_2018.pdf?m=1545315901647)

<sup>2</sup> <https://www.southessex.org.uk/opportunity-south-essex>

- 2.2. The SEC is supported by the South Essex Joint Officers Group which both CPBC and SCC officers attend, and the group meets regularly. Through joint working shared evidence is prepared and strategic issues along with local plan preparations are discussed.
- 2.3. At a regional level the Essex Planning Officers Association represents officers from all 14 local authorities in Essex including CPBC and SCC. Planning heads from each local authority meet several times a year to provide leadership and discuss strategic matters across all of Essex. Terms of reference including governance for this decision-making body was agreed in December 2020<sup>3</sup>.
- 2.4. CPBC also has one to one regular meetings with SCC to consider any specific cross border strategic matters, shared evidence and to appraise each other on their local plan preparation and any potential impacts.
- 2.5. CBPC has fully engaged with SCC on the development of its local plan from the outset. In accordance with the Town and Country Planning (Local Planning) (England) regulations, SCC has been formally consulted at each stage of consultation on the Castle Point Plan. The Duty to Cooperate Compliance Statement (DATE) outlines in detail the engagement activities and outcomes together with the joint evidence base studies undertaken during the Plan's preparation and any protocols agreed which benefit strategic and cross boundary plan making.

### **3. Strategic Matters**

- 3.1. South Essex's proximity to London and its position on the Thames Estuary have been the major factors behind the historical growth of South Essex and these will continue to be major influences on its future growth and wider relationship with the rest of Essex. London Southend Airport and the forthcoming Lower Thames Crossing which will link Essex via Thurrock to Kent will also provide economic opportunities for the area.
- 3.2. As neighbouring authorities CPBC and SCC are inter- connected in terms of transport connections, economic and employment ties, education and skills, leisure and sport, housing market overlaps and shared environmental interests including shared areas of Green Belt and the Thames estuary.
- 3.3. South Essex 2050 Ambition was initiated by the Association of South Essex Local Authorities (ASELA) in 2018 and furthered by South Essex Councils (SEC) and aims to build on South Essex's economic opportunities. Its objectives are to

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<sup>3</sup> [Chief Officers' Group and EPOA Partnership - Terms of Reference](#)



prioritise growth that provides good digital infrastructure, improved transport connectivity, enhanced green and blue infrastructure opportunities, greater commercial development and employment skills and good quality housing in the right places.

3.4. The Castle Point Plan's vision and objectives are in accord with the South Essex 2050 Ambition and envisages a borough where residents have good quality and affordable homes in thriving communities with access to green spaces, economic opportunities, and amenities enabling them to fulfil their potential and live happy, healthy lives.

3.5. Both CPBC and SCC support the vision of South Essex as described in the South Essex 2050 ambition and agree to progress this vision through their plan making.

#### **4. Infrastructure: Strategic transport connections.**

4.1. The A127 or Southend Arterial Road provides a strategic east to west route across South Essex stretching from Southend through Castle Point to London Borough of Havering with direct access to the M25, A130 and A13. It is not trunked and spans three highway authorities and five local planning authorities. The route already experiences significant capacity issues, particularly at key junctions such as Fairglen Interchange a crucial link at Benfleet connecting the A127 to A130 for Chelmsford and Canvey Island and the Rayleigh Weir Interchange which connects A127 to A129 Rayleigh to Hadleigh.

4.2. Junction Modelling has been included in the CPBC Transport Assessment report and assessed the likely impacts of planned growth on the highway network in the Castle Point area. This included a high-level analysis of cross boundary traffic flows on key highway links including A13/London Road and A127.

4.3. SCC have carried out their own transport modelling and have also identified traffic pressures along the A127.

4.4. Essex County Council (ECC) is the local Highways and Transportation Authority and is responsible for local transport planning and the provision and maintenance of the highway network for Castle Point. SCC as a unitary authority has its own highways authority. ECC is preparing the Local Transport Plan, which is currently being updated to LTP4 with the collaboration of all Essex authorities. SCC is also preparing its own LTP for its own authority area. Essex is currently entering a transitional phase, with the election of a Mayor for Greater Essex and changes to Local Government structures as a result of devolution and local government reform, but Essex County Council with the collaboration of Essex authorities including CPBC and SCC are finalising the preparation of LTP4

to support the new structures once they are in place as well as guide the development in emerging local plans.

- 4.5. The SEC authorities and London Borough of Havering have prepared a statement of common ground<sup>4</sup> with regards to the issues for sustainable growth and plan making that the A127 Transport Corridor presents. The Highway Authorities are also developing a joint Implementation Plan as part of the A127 Corridor for Growth (The Route Management Strategy) and along with the A127 Corridor Engagement Group are making the case for the A127 to be re-adopted as a trunk road up to the boundary of the City of Southend.<sup>5</sup>
- 4.6. Both CPBC and SCC support and are actively involved in these initiatives for improvements to the A127, and are also committed to working together to alleviate congestion at various pinch points on the A127 and along A13 London Road. Both Councils have regard to their respective Local Transport Plan within their local plans.
- 4.7. CPBC and SCC agree to continue to work collaboratively towards mitigating the cumulative impact of their growth plans on the shared transport routes including those which might arise from the regeneration of Hadleigh town centre. Both Councils also agree to work collaboratively with relevant organisations and neighbouring authorities to ensure that the necessary infrastructure is in place to support the growth needs set out in their Local Plans.

## **5. Housing Need**

- 5.1. In December 2024, the government introduced changes to the National Planning Policy Framework (NPPF) along with changes to the standard methodology for calculating housing need, from this the government set mandatory annual housing delivery targets which will require local authorities to plan for significantly more housing within the South Essex area.
- 5.2. The Housing Need as defined by the Government's Standard Methodology for CPBC over the planned period of 2026-2043 is 11,662, which equates to an average of 686 dwellings per annum. The annual housing delivery for Castle Point over the last 4 years averages at 100 dwellings per annum. Castle Point is 17.4 square miles in size with a population density of 4,976 per square mile. Over half of the borough is designated Green Belt and the majority of the borough is low lying land below sea level resulting in 45% of it in flood zone 3.
- 5.3. SCC agrees that Castle Point faces notable physical constraints including size, density and transport issues and environmental constraints with a substantial

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<sup>4</sup> SoCG A127 Corridor

<sup>5</sup> [A127 Economic Growth Corridor | Essex County Council](#)

proportion of land designated as Green Belt and a significant proportion falling within Flood Risk Zone 3

- 5.4. CPBC has commissioned various pieces of work to review land availability throughout the Local Plan Making process including earlier work on Strategic Land Availability and Urban Capacity January 2023 and the Borough wide development options and technical paper July 2024 which identified land availability outside of Green Belt and through density modelling and site identification looked at the most effective use of this land for development.
- 5.5. CPBC have also prepared a Green Belt Assessment July 2025<sup>6</sup> as guided by the NPPF to identify potential Green Belt sites for development. Identified sites were reviewed against further criteria: designated habitat and heritage sites; flood risk zones; transport restraints e.g. access issues or requirements for significant upgrades on highways impacting viability; and sustainability criteria. This work has been described in the Housing Capacity Topic paper July 2025<sup>7</sup>. CPBC also prepared the Strategic Land Availability Assessment July 2025<sup>8</sup> and Site Assessments for Canvey Island<sup>9</sup>, Benfleet, Hadleigh, Thundersley and Daws Heath<sup>10</sup> July 2025. The approach to site assessments is further supported by the Sustainability Appraisal July 2025.<sup>11</sup>
- 5.6. CPBC has considered what housing delivery can be realistically achieved within its boundaries taking into account its significant environmental and infrastructure restraints as well as its market capacity. The evidence from the Green Belt Assessment, Strategic Land Availability Assessments, Housing Topic Paper and the recently finalised Porter Planning Economics Castle Point Housing Delivery Technical Note has identified that CPBC has the capacity to deliver 6,196 homes through the planned period. This is reflected in the Draft version of the Castle Point Local Plan.
- 5.7. CPBC realises that the Castle Point Plan delivers considerably less housing than the Standard Method Housing Need but considers based on the evidence that this is a realistic housing delivery.

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<sup>6</sup> [Castle Point Green Belt Assessment July 2025](#)

<sup>7</sup> [Housing Capacity Topic Paper August 2025](#)

<sup>8</sup> [Strategic Land Availability Assessment July 2025](#)

<sup>9</sup> [Strategic Land Availability Site Assessment Canvey Island July 2025](#)

<sup>10</sup> [Strategic Land Availability Site Assessment Benfleet, Thundersley, Hadleigh, Daws Heath July 2025](#)

<sup>11</sup> [Sustainability Appraisal Main Report July 2025](#)

5.8. Both CPBC and SCC have requested assistance from each other to meet their unmet housing need within their authority areas. Neither authority is in a position to assist with each other's unmet housing need

5.9. CPBC and SCC agree that the Castle Point Plan is proposing a lower housing delivery than the standard Method housing need.

## **Housing Strategy**

6.1 Policy SP3 of the Castle Point Plan describes the housing strategy of delivering 6,196 homes of the planned period by focusing on brownfield redevelopment, regeneration of town centres and urban intensification.

6.2 The Castle Point Plans for growth along London Road and the A130 at B2 Tarpots Town Centre, B3 Former Furniture Kingdom site, B5 Canvey Supply, B7c 312-320 London Road (Queen Bee's), HAD1 Hadleigh Town Centre, HAD3 Hadleigh Clinic, THUN2 Kiln Road Campus. SCC recognises the growth potential along this route within its own Local Plan.

6.3 Both authorities have agreed to work together on preparing a consistent approach to urban intensification and to develop design guidance to ensure that development in bordering areas such as London Road is consistent in its quality and responds sensitively to the prevailing local character of the area.

6.4 CPBC agrees to engage with SCC early on in any development proposals to develop Hadleigh town centre.

## **7 The Environment and Climate Change**

7.1 Supporting the environment to combat the effects of climate change and protecting and enhancing the area's green spaces is at the heart of the Castle Point Plan. Both CPBC and SCC are committed to reducing greenhouse emissions towards carbon net zero by 2050 through their local plans.

7.2 The Castle Point Plan is committed to improving biodiversity within its borough and in developing its housing strategy, has had regard for the Essex Local Nature Recovery Strategy<sup>12</sup>. Both CP and SCC have endorsed the Essex Local Nature Recovery Strategy as a strategy for nature recovery in Essex.

7.3 The Essex Coast Recreational Disturbance Avoidance & Mitigation Strategy (RAMS)<sup>13</sup> was prepared by a partnership of all 12 Essex Councils to ensure that the recreational impact from their shared growth on the Thames Coastal areas was avoided or mitigated for. The Essex coastline is designated under the UK Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) as part of the European Natura 2000 network and is an important habitat for many birds. Both CPBC and SCC worked with the other Essex Councils to develop the strategy which was led by Place Services at Essex

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<sup>12</sup> [Local Nature Recovery Strategy | Essex County Council](#)

<sup>13</sup> [Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy 2020](#)

County Council and implemented through Bird Aware Essex Coast. The strategy has been implemented by both authorities within their planning processes and RAMS tariffs are being collected. Both authorities agree to continue to work together through future Essex RAMs updates to protect the wildlife on the Essex Coastline.

7.4 South Essex is vulnerable to natural hazards such as floods, droughts and extreme temperatures due to climate change. Both Castle Point and Southend are at risk of flooding with approximately 45% of Castle Point's authoritative area being in Flood Risk Zone 3. Both councils are committed to mitigating flood risk. The Riverside Strategies will be prepared with all relevant South Essex Councils and the Environment Agency to ensure that the Thames Estuary 2100 Plan<sup>14</sup> is implemented allowing for improvements to and management of flood defences. It also aims to improve public access to the coast and promote improvements to ecological networks and habitats.

7.5 The London Fenchurch Street to Shoeburyness railway line which connects Benfleet and Southend has been identified as an area of risk of tidal flooding. This is an important line for residents to access employment in each other's authority areas and for tourism. SCC and CBPC agree to work with partners within the railway industry and other relevant organisations to identify economically viable solutions to protect the railway line from future flooding events.

7.6 CPBC and SCC agree to collaborate with the Environment Agency, lead local flood authorities and neighbouring authorities to ensure that their Riverside Strategies for the Thames Estuary which include the Bowers Marshes, Canvey Island and Hadleigh Marshes are implemented, and recognising the opportunities for Two Tree Island near Leigh on Sea.

## **8. The Green Belt Assessment**

8.1 Castle Point's Green Belt Assessment July 2025 reviewed all potential development sites within its Green Belt. Due to their shared boundary, the Green Belt is continuous to the east of Castle Point, around Hadleigh into the Leigh-on-Sea within Southend-on-Sea. Land South of Hadleigh (GB8) has been considered through Castle Point's Green Belt Assessment. Within the Regulation 18 consultation of the Castle Point Plan, SCC raised objections to this area being considered as grey belt due to its greenbelt function of separating the settlements of Hadleigh and Southend, as well as its historic context to Hadleigh Castle. The Green Belt Assessment has concluded that the site is not grey belt and GB8 was not brought forward as a development site within the Castle Point Plan.

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<sup>14</sup> [Thames Estuary 2100 \(TE2100\) - GOV.UK](#)

8.2 SCC will be updating its Green Belt study to reflect the NPPF 2024 and will engage with CPBC as a neighbouring Green Belt authority in relation to the study's methodology to ensure consistency.

8.3 SCC recognises the considerable constraints that CPBC has in meeting development needs within its authoritative area. SCC also has considerable environmental and physical restraints and equally is unable to meet the standard methodology housing need. SCC is therefore unable to assist CPBC in meeting its unmet housing need.

8.4 Following the revised NPPF 2024 and the introduction of the new standard methodology for calculating housing need, CPBC contacted its neighbouring authorities including SCC in January and February 2025 to assist with meeting that newly calculated housing need. This was in accordance with the Essex Planning Officer's Association (EPOA) Unmet Housing Need protocol. All responded with the view including SCC that at the time they could not offer any assistance in meeting CPBC's unmet housing needs. Likewise, given that CPBC is not able to identify sufficient sites to meet its own need, it cannot therefore accommodate unmet need arising from SCC during the plan period.

8.5 CPBC and SCC are working through the South Essex Joint Officers Group to try to address their unmet housing need. Part of this work includes reviewing the EPOA mechanism for considering unmet housing need established in 2017 and providing a shared joint position statement on the housing need within South Essex.

8.6 Both CPBC and SCC agree to continue to work collaboratively through SEC to address their unmet housing need within their respective authority areas.

## **9 Modifications to Castle Point Plan Regulation 19 Draft**

9.1 SCC through their representation to the Castle Point Plan Regulation 19 Draft, identified three potential modifications to the Plan. These are set out below and resolve the representations from SCC. All modifications in this SoCG are also included in the Council's Modification Schedule.

- The Strategic Position of Castle Point within South Essex – diagram is to be updated to include Leigh Port as “Port Facilities”.
- Monitoring Framework Objective 19 – update the monitoring indicator to read as “~~submission~~ **percentage of** health impact assessments **submitted for relevant applications**”
- Monitoring Framework Objective 20 – additional monitoring indicator included to read as “**number of new community use agreements per year**”

## **10 Areas of Agreement**

- 10.1 CPBC has worked collaboratively with SCC to ensure that all cross boundary strategic issues have been properly considered and where appropriate reflected in the Castle Point Plan 2026 to 2043, and effective and ongoing joint working has and will continue to be undertaken.
- 10.2 It is agreed that the Castle Point Plan 2026-2043 does not allocate sufficient sites to meet the Standard Methodology Housing Need for housing at this time. It is agreed that there are significant evidenced environmental, physical and infrastructure constraints which impact on this.
- 10.3 It is agreed that both CPBC and SCC will pursue strategies which include brownfield development and urban intensification and will explore collaborative design guidance for any closely connected areas such as A13/London Road.
- 10.4 It is agreed that infrastructure needs, need to keep pace with growth and both SCC and CPBC will work collaboratively to address the cumulative impact of their growth plans on shared highways and with all relevant organisations and neighbouring authorities to enable growth.
- 10.5 It is agreed both CPBC and SCC will support environmental strategies of Essex RAMS, Essex LNRS and the Thames 2100 Plan, The Riverside Strategies to protect designated sites, support nature recovery and mitigate flood risk in South Essex.

## **11 Areas of Uncommon Ground**

- 11.1 Through the Duty to Cooperate, CPBC and SCC have jointly considered issues relating to housing, gypsy and traveller needs, jobs and employment, retail and tourism, natural environment, strategic site allocations and the sustainability appraisal. There are currently no areas of uncommon ground in relation to these topics.
- 11.2 SCC raised objection to the CPBC Regulation 19 Local Plan regarding its failure to meet identified housing need as defined by the national standard methodology, and the removal of Green Belt sites that had been previously considered suitable for development. Through further discussion between the authorities SCC can confirm that it has no evidence to suggest those discounted sites should be included within the local plan.

## **12 Additional Strategic Matters**

- 12.1 There are no additional strategic matters which CPBC and SCC are aware of which has not already been addressed by this Statement of Common Ground.

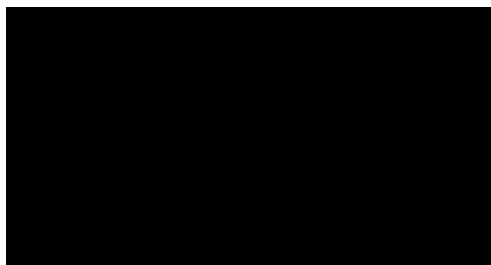
## **13 Monitoring**

13.1 This statement will be maintained by CPBC and updated as necessary.

## **14 Signatories**

**14.1** The signatories agree that the Castle Point Plan has been prepared in accordance with the “Duty to Cooperate” imposed by Section 33A of the Planning and Compulsory Purchase Act 2004 in that the Council has cooperated with SCC as a neighbouring authority, through constructive and ongoing engagement on the impacts of sustainable development set out in the Duty Cooperate State of Compliance and that there are no outstanding strategic planning issues to be addressed.

Castle Point

A large black rectangular box redacting the signature of Amanda Parrott.

Amanda Parrott  
17/12/2025

Southend

A small black rectangular box redacting the signature of Mark Sheppard.

Mark Sheppard  
05/12/2025





**Statement of Common Ground**

**Castle Point Plan 2026 to 2043**

**Regulation 19 Pre-Submission Draft**

-  
**Between**  
-

**Castle Point Borough Council**

**and**

**Thurrock Council**

**Castle Point Local Plan 2026 to 2043**

**Date: 9 January 2026**

## **1. Introduction**

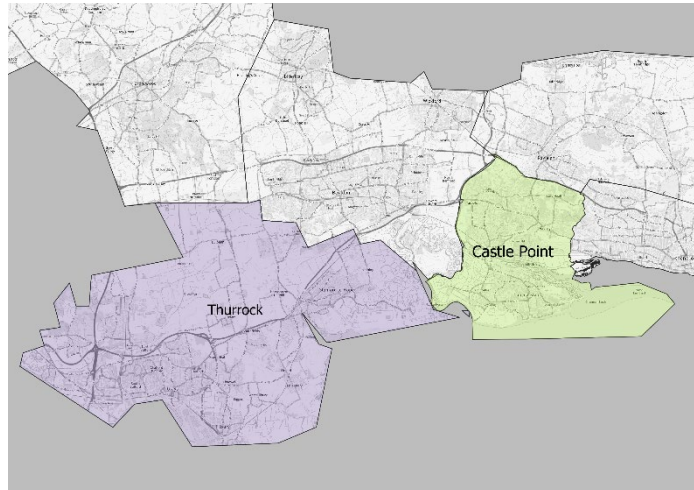
1.1. This Statement of Common Ground identifies areas of agreement between Castle Point Borough Council (CPBC) and Thurrock Council (TC) in relation to Castle Point Plan 2026-2043 and supporting evidence base. There are no outstanding areas of disagreement.

1.2. This statement has been prepared to assist the examination of the Castle Point Plan. Thurrock Council made representations to Regulation 18 Consultation in issues and options and Regulation 19 Publication of the Plan drafts published for consultation on 22<sup>nd</sup> July 2024 to 16<sup>th</sup> September 2024 and on 1<sup>st</sup> August 2025 to 26<sup>th</sup> September 2025 consecutively. TC confirmed their response to the Regulation 19 Draft during the further consultation 5<sup>th</sup> December 2025. TC representations cover strategic cross boundary issues relating to:

- Meeting Housing Need and Policy SP3
- Policy C5 Access to Canvey Island
- Sustainable Development SP4 and SP5
- Local Wildlife and Geological Sites ENV4

The map below shows the locations and administrative areas covered by this statement. Castle Point and Thurrock are neighbouring coastal areas in South Essex situated on the north bank of the Thames Estuary, they share an administrative boundary along Holehaven Creek to the west of Castle Point. Thurrock is only 18 miles from London, it includes the northern end of the Dartford Crossing and is an area of regeneration within the Thames Gateway redevelopment Zone. The borough comprises of the settlements of Grays, Chadwell St Mary, Chafford Hundred, Purfleet-on-Thames, South Ockendon, Stanford-le-Hope, Tilbury and a number of smaller villages. Castle Point Borough Council governs the settlements of Canvey Island, Benfleet, Daws Heath, Hadleigh and Thundersley.

## Map of Authority Areas



1.3. The Castle Point 1998 Adopted Local Plan forms the development plan for the Borough. The Castle Point Plan will cover the period of 2026 to 2043 and aims to grow with a focus on regeneration, brownfield redevelopment and increased density in urban areas whilst protecting its green belt and ensuring that growth is climate resilient and supported by essential infrastructure.

## 2. Duty to Cooperate

2.1. The councils of Basildon, Brentwood, Castle Point, Rochford, Southend on Sea, Thurrock and Essex County Council formed a strategic partnership in 2017 to develop a long-term growth ambition which would underpin strategic spatial, infrastructure and economic priorities in South Essex. The collaboration was underpinned by a Memorandum of Understanding (MoU) signed in January 2018<sup>1</sup> creating the Association of South Essex Local Authorities (ASELA). In 2023 the leaders and Chief Executives agreed to refresh the identity for the partnership which is now known as South Essex Councils (SEC). The SEC's core purpose is to provide leadership for South Essex and to deliver a vision for the region up to 2050<sup>2</sup> in order to promote healthy growth for South Essex Communities. This is achieved through collaboration, by sharing resources, joint evidence and by lobbying government.

2.2. The SEC is supported by the South Essex Joint Officers Group which both CPBC and TC officers attend, and the group meets monthly. Through joint working shared evidence is prepared and strategic issues along with local plan preparations are discussed.

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<sup>1</sup> [South-Essex-Joint-Strategic-Plan-Statement-of-Common-Ground-June-2018](#)

<sup>2</sup> <https://www.southessex.org.uk/opportunity-south-essex>

- 2.3. At a regional level the Essex Planning Officers Association represents officers from all 14 local authorities in Essex including CPBC and TC. Planning heads from each local authority meet several times a year to provide leadership and discuss strategic matters across all of Essex. Terms of reference including governance for this decision-making body was agreed in December 2020<sup>3</sup>.
- 2.4. CPBC also has one to one quarterly meetings with TC to consider any specific cross border strategic matters, shared evidence and to appraise each other on their local plan preparation and any potential impacts.
- 2.5. CPBC has also collaborated with TC on various environmental strategy documents, and these include the EPOA Planning Policy Statement- Operation Energy and Carbon (Net Zero) October 2025, and the Work of the Essex Climate Action Commission, the Essex Local Nature Recovery Strategy, The Riverside Strategy for implementation of the Thames Estuary 2100 plan and the Essex Recreational Avoidance and Mitigation Strategy. All of which have been implemented across both authorities.
- 2.6. CBPC has fully engaged with TC on the development of its local plan from the outset. In accordance with the Town and Country Planning (Local Planning) (England) regulations, TC has been formally consulted at each stage of consultation on the Castle Point Plan. The Duty to Cooperate Compliance Statement outlines in detail the engagement activities and outcomes together with the joint evidence base studies undertaken during the Plan's preparation and any protocols agreed which benefit strategic and cross boundary plan making.

### **3. Strategic Matters**

- 3.1. South Essex's proximity to London and its position on the Thames Estuary have been the major factors behind the historical growth of South Essex and these will continue to be major influences on its future growth and wider relationship with the rest of Essex. Southend Airport, the Port of Tilbury and DP World London Gateway in Thurrock and the forthcoming Lower Thames Crossing which will link Essex via Thurrock to Kent will also provide economic opportunities for the area.
- 3.2. As neighbouring authorities CPBC and TC are inter- connected in terms of transport connections, economic and employment ties, education and skills,

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<sup>3</sup> [Chief Officers' Group and EPOA Partnership - Terms of Reference](#)

housing market overlaps and shared environmental interests including shared areas of the Thames estuary.

- 3.3. South Essex 2050 Ambition was initiated by the Association of South Essex Local Authorities (ASELA) in 2018 and furthered by South Essex Councils (SEC) and aims to build on South Essex's economic opportunities. Its objectives are to prioritise growth that provides good digital infrastructure, improved transport connectivity, enhanced green and blue infrastructure opportunities, greater commercial development and employment skills and good quality housing in the right places.
- 3.4. The Castle Point Plan's vision and objectives are in accord with the South Essex 2050 Ambition and envisages a borough where residents have good quality and affordable homes in thriving communities with access to green spaces, economic opportunities, and amenities enabling them to fulfil their potential and live happy, healthy lives.
- 3.5. Both CPBC and TC support the vision of South Essex as described in the South Essex 2050 ambition.

#### **4. Housing Need**

- 4.1. In December 2024, the government introduced changes to the National Planning Policy Framework (NPPF) along with changes to the standard methodology for calculating housing need, from this the government set annual housing delivery targets which will require local authorities to plan for significantly more housing within the South Essex area.
- 4.2. The Standard Method Housing Need for CPBC over the planned period of 2026-2043 is 11,662, which equates to an average of 686 dwellings per annum. The annual housing delivery for Castle Point averages at 100 dwellings per annum. Castle Point is 17.4 square miles in size with a population density of 4,976 per square mile. Over half of the borough is designated Green Belt and much of the borough is low lying land below sea level resulting in 45% of it in flood zone 3.
- 4.3. CPBC has considered through its evidence what housing delivery can be realistically achieved within its boundaries taking into account its significant environmental and infrastructure restraints as well as its market capacity. The evidence identified that CPBC is able to deliver 6,196 homes through the planned period. A master planning approach will be taken to delivering these homes, which will be delivered by intensification of urban density, regeneration and reuse of brownfield sites.

- 4.4. TC agrees that Castle Point faces notable physical and environment constraints to growth and TC has no objections to CPBC's approach to addressing housing need.

## **5. Meeting Unmet Housing Need**

- 5.1. Following the revised NPPF 2024 and the introduction of the new standard methodology for calculating housing need, CPBC contacted its neighbouring authorities including TC in January and February 2025 to assist with meeting the newly calculated housing need. This was in accordance with the Essex Planning Officer's Association (EPOA) Unmet Housing Need Protocol 2017. As yet no authority is able to assist CPBC.
- 5.2. 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.
- 5.3. TC agrees that CPBC has followed the EPOA Unmet Housing Need protocol 2017 to address its unmet housing need.
- 5.4. CPBC is working through the South Essex Joint Officers Group to try to address their unmet housing need. Part of this work includes reviewing the EPOA mechanism for considering unmet housing need established in 2017 and providing a shared joint position statement on the housing need within South Essex.
- 5.5. Both CPBC and TC agree to continue to work collaboratively through SEC to address CPBC and other authority areas' unmet housing need within South Essex, while recognising the significant constraints that each of these authority areas face in meeting that need.

## **6. Policy C5- Improved Access to and around Canvey Island**

- 6.1. Since 1974 the population on Canvey Island has grown by 150% but there still remains just two routes on and off Canvey Island, both become extremely congested during peak times. One route is via the A130 Canvey Way and the other is via B1012 from South Benfleet and both routes converge at a pinch point at Waterside Farm Roundabout. The A130 route has further congestion issues at Sadlers Farm Junction off the island as does the B1014 through Benfleet. There are aspirations for a third route off the island and CPBC is

committed to working with key stakeholders to prepare a feasibility study to identify options for improving access on and off the island.

6.2. In the Regulation 18 consultation to the Castle Point Plan, TC objected to a proposal for a link road from Canvey Island (Northwick Road) to Thurrock (Manorway), due to the impact on the landscape, designated sites and highways particularly at the Junction of Manorway and A13, and the impact for those communities along Manorway. The Regulation 18 consultation sought views on how access to and through Canvey could be improved. It remains a local aspiration to deliver a third road to Canvey Island, although currently there is no deliverable scheme that can be identified. TC notes that CPBC intends to prepare a feasibility study (Policy C5) to explore options and welcomes further discussion to provide for better access to and from Canvey Island

6.3. CPBC and TC agree to collaborate on the feasibility work to explore the options for better access to and from Canvey Island.

## **7. Sustainable Development Net Zero Carbon Development SD4 & SD5**

7.1. Supporting the environment to combat the effects of climate change and protecting and enhancing the area's green spaces is at the heart of the Castle Point Plan. Both CPBC and TC are committed to reducing greenhouse emissions to carbon net zero by 2050 through their local plans.

7.2. TC supports the Net Zero Carbon Development policies SD4 In operation and SD5 Embodied Carbon as policies that represent a substantial step in addressing climate change across South Essex and providing certainty and clarity to developers. Following feedback from Essex County Council Climate Commission during the Regulation 19 consultation, these policies have been updated to the latest model draft based on the Net Zero Carbon Viability and Tool Kit Study and to align with the latest EPOA Planning Policy Statement Operational Energy and Carbon (Net Zero) October 2025

7.3. CPBC and TC agree that it is appropriate to pursue a Climate Responsive Design approach in their respective local plans, while acknowledging that detailed policy in the Thurrock Local Plan will be subject to confirmation of evidence and testing.

## **8. Sustainable Development Local Wildlife and Geological Sites ENV4**

8.1. The Castle Point Plan is committed to improving biodiversity within its borough and in developing its housing strategy has had regard for the Essex Local Nature

Recovery Strategy<sup>4</sup>. Both CP and TC have endorsed the Essex Local Nature Recovery Strategy as a strategy for nature recovery in Essex.

8.2. TC supports Policy ENV4 and the direct reference to the Local Nature Recovery Strategy requiring development proposals to have regard for and protect strategically important areas of biodiversity.

8.3. CPBC and TC agree to enable and support biodiversity opportunities through their local plans.

## **9. Modifications to Castle Point Plan Regulation 19 Draft**

9.1. TC through their representation to the Castle Point Plan Regulation 19 Draft, have identified no modifications to the Plan.

## **10. Areas of Agreement**

10.1 CPBC has worked collaboratively with TC to ensure that all cross boundary strategic issues have been properly considered and where appropriate reflected in the Castle Point Plan 2026 to 2043 and effective and ongoing joint working has and will continue to be undertaken.

10.2 It is agreed that the Castle Point Plan 2026-2043 does not allocate sufficient sites to meet the Standard Methodology Housing Need for housing at this time. It is agreed that evidence has been provided of environmental, physical and infrastructure constraints which prevent this.

10.3 It is agreed both CPBC and TC will support environmental strategies to conserve and enhance local wildlife sites and geological sites through their local plan making.

10.4 It is agreed that both CPBC and TC will support policies to ensure that all buildings are designed and built to be Net Zero Carbon in operation and in embodied carbon in line with the EPOA Planning Policy Statement- Operation Energy and Carbon (Net Zero) October 2025, and the Work of the Essex Climate Action Commission, subject to confirmation of evidence and testing of the Thurrock Local Plan and its formal approval for submission for Examination.

10.5 It is agreed that both CPBC and TC will support habitat priority measures identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).

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<sup>4</sup> [Local Nature Recovery Strategy | Essex County Council](#)



## **11 Areas of Uncommon Ground**

11.1 Through the Duty to Cooperate, CPBC and TC have jointly considered issues relating to housing, gypsy and traveller needs, jobs and employment, retail and tourism, natural environment, strategic site allocations and the sustainability appraisal. There are currently no areas of uncommon ground in relation to these topics.

## **12 Additional Strategic Matters**

12.1 There are no additional strategic matters which CPBC and TC are aware of which has not already been addressed by this Statement of Common Ground.

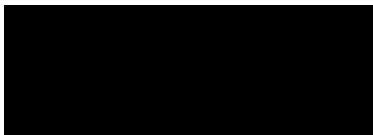
## **13 Monitoring**

13.1 This statement will be maintained by CPBC and updated as necessary.

## **13. Signatories**

13.2 The signatories agree that the Castle Point Plan has been prepared in accordance with the “Duty to Cooperate” imposed by Section 33A of the Planning and Compulsory Purchase Act 2004 in that the Council has cooperated with TC as a neighbouring authority, through constructive and ongoing engagement on the impacts of sustainable development set out in the Duty Cooperate State of Compliance and that there are no outstanding strategic planning issues to be addressed.

Name: Amanda Parrott



Position: Assistant Director, Climate and Growth

Date: 9<sup>th</sup> January 2026

Castle Point Borough Council

Name: Ashley Baldwin



Position: Chief Planning Officer

Date: 09.01.2026

Thurrock Council



**Statement of Common Ground**  
**Castle Point Plan 2026 to 2043**  
**Regulation 19 Pre-Submission Draft**  
  
Between  
  
Castle Point Borough Council  
  
and  
  
Natural England  
  
January 2026

## **1. Introduction**

- 1.1 This Statement of Common Ground (SoCG) has been prepared jointly by Castle Point Borough Council (CPBC) and Natural England (NE) in relation to the Castle Point Local Plan (known as the Castle Point Plan).
- 1.2 The purpose of this SoCG is to set out the areas of agreement and any outstanding matters between the parties, in accordance with the requirements of the National Planning Policy Framework (NPPF, paragraph 28) and the Planning Practice Guidance (PPG).
- 1.3 CPBC has fully engaged with NE on the development of the Castle Point Plan from the outset with regards its role as statutory consultee.
- 1.4 In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, NE has been formally consulted at Regulation 18 and 19 stages of consultation together with its accompanying Sustainability Appraisal/Strategic Environmental Assessment.
- 1.5 This SoCG identifies the matters on which CPBC and NE are agreed, as well as any areas where differences remain.

## **2. Strategic Matters**

- 2.1 NE and CPBC agree to work collaboratively and on an ongoing basis with regards to Local Plan policies, implementation of site allocations, masterplans, green infrastructure, biodiversity net gain, habitats regulation assessments and protection and enhancement of international and sites, protection and enhancement of statutory and non-statutory designated sites, protection and enhancement of priority habitats and species, flood protection measures, landscape assessments and open space provision. Some of this engagement will be through meetings at sub-regional level on matters such as the Recreation Area Mitigation Strategy (RAMS) and the revisions to the tariff.

## **3. Areas of Agreement (Common Ground)**

- 3.1 NE submitted representations to the Castle Point Plan during the Regulation 19 Draft Consultation (August to September 2025) on 10<sup>th</sup> October 2025, having agreed a short extension of time. Natural England confirmed their position during the further consultation (October to December 2025) on 25<sup>th</sup> September 2025.

3.2 NE supports the direction and aims of several key policies and principles, as follows:

Strategic Policy SP4 - Development Contributions	NE welcomes the inclusion of green and blue infrastructure (GI) in this policy.
Policy C1 - Canvey Town Centre	NE is pleased to see reference to Essex Local Nature Recovery Strategy (LNRS) in this and other place-based policies.
Policy C3 - Canvey Port Facilities	Natural England notes the potential for development or redevelopment of the facilities at this site and are pleased that Castle Point recognise the importance of ensuring any proposals of this nature must be in line with relevant nature conservation legislation to avoid impacting any nearby protected sites.
Place-based policies DH1, Thun4 and C6	NE welcomes the place-based policies focused on protecting important areas of greenspace and their connectivity across the district, e.g. Daws Heath (DH1), Thundersley (Thun4) and the Green Lung (C6). We support the general aims of these policies to improve the connectivity and condition of the GI network and its habitats, and address deficiencies in access to greenspace.
Policy C6	NE supports policy C6 to protect the South Canvey Green Lung as an important asset for people and nature, and its aims to align with the Essex LNRS and seek opportunities to create new habitat (e.g. through BNG) wherever possible.
Policy Thun 4 – Green Space Connectivity in Thundersley	NE is pleased to see reference to ‘projects to promote the continued improvement of the local wildlife sites and Thundersley Great Common SSSI and recovery of its currently unfavourable condition’.
Policy DH1 – Green Space Connectivity in Daws Heath	NE is pleased to see reference to ‘projects to promote the continued improvement of the local wildlife sites and SSSIs (Garrold’s Meadow and Great Wood and

Dodd's Grove) and recovery of sections that are in an unfavourable condition'.

Policy ENV2 – Coastal & Riverside Strategy

Natural England welcomes the strategic approach set out in Policy ENV2 with regards to coastal management and will review the Riverside Strategy HRA when this is available. We would encourage Castle Point to explore potential nature-based solutions to coastal and flood management as these can create opportunities for environmental enhancement that may help to mitigate any potential impacts on protected sites or act as compensatory measures should these be required.

Policy ENV6 – Best and Most Versatile Agricultural Land

NE supports the protection of best and most versatile agricultural land.

3.3 The entries overleaf set out the agreed modifications to the Castle Point Plan, which resolve the majority of Natural England's representations. All modifications in this SoCG are also included in the Council's Schedule of Modifications.

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
0341	Vision & Objectives	Natural England welcomes the reference to multi-functional green infrastructure (GI) in the Vision but advise that the protection of existing nature conservation sites and adherence to nature recovery priorities should be included. Natural England supports objectives 2, 3 and 4 relating to multi-functional GI and biodiversity networks but we strongly advise including an objective to protect and enhance nature conservation sites.	<p><u>Addition to Vision point 3 as follows:</u></p> <ul style="list-style-type: none"> <li>• <b>Natural assets are protected and nature recovery is prioritised.</b> Green spaces in local areas will be pleasant places to rest and play and will be connected into the wider network of multi-functional green infrastructure, providing opportunities to connect with nature.</li> </ul>
0341	Policy SP1– Supporting Enhancement of the Borough’s Green Spaces	Natural England welcomes the support for the delivery of the Essex Local Nature Recovery Strategy (LNRS) and the new opportunities to deliver multi-functional GI and wider benefits. However, please note that	<p><u>Modification to Policy SP1</u></p> <p>4. Protecting the function of the Borough’s Green Belt and coastal areas by supporting opportunities to enable improved access, health and wellbeing and leisure infrastructure, for the overall enjoyment of residents, <b>subject to sensitive consideration of environmental assets including internationally important coastal</b></p>

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
		<p>protecting coastal areas to enable improved access will need to be delivered sensitively to ensure that the notified interest features of internationally important coastal sites are not adversely impacted by additional recreational pressure. We welcome the reference in the supporting text to the 'protection of Habitats Sites identified through international legislation' (6.13, 6.14).</p> <p>The management of any new and enhanced green infrastructure should be considered as part of the planning process, ensuring it provides long-term benefits for Castle Point. Natural England recommends that green infrastructure delivered within (or associated with) major new developments</p>	<p><b>sites and ensuring they are not adversely impacted by recreational pressure.</b></p> <p><b>5. The management of any new and enhanced green infrastructure must be considered as part of the planning process, ensuring it provides long-term benefits for Castle Point. Green infrastructure delivered within (or associated with) major new developments should be managed, maintained and monitored for a minimum of 30 years in accordance with Natural England's GI Strategy Standard.</b></p>

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
		<p>should be managed, maintained and monitored for a minimum of 30 years[1]</p> <p>.</p> <p>[1] See: Natural England's Green Infrastructure Framework: GI Strategy Standard</p>	
0341	Policy SP2 - Making Efficient Use of Urban Land and Creating Sustainable Places	Please note that brownfield sites in Castle Point may have important biodiversity value, particularly for invertebrates, and this should be reflected in the policy.	<p><u>Modification to Policy SP2</u></p> <p>3d. Support integrated access to public open space, and the enhancement of the multi-functional green infrastructure network <b>and biodiversity</b> to offer a range of health, and environmental benefits;</p> <p><u>Modification to Reasoned Justification</u></p> <p>6.30 As the density of the urban areas increases within the Borough, the need to protect and enhance access <b>and existing environmental assets</b> to make the best use of local open spaces <b>and protect urban biodiversity</b> becomes more acute. By opening up access to a wide range of facilities, residents and visitors will have an increased choice about when and how often they use local green assets.</p>
0341	Policy SP3 – Meeting	6.47 A Habitats Regulations Assessment will be required for	<u>Modification to Reasoned Justification</u>



Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
	Development Needs	<p>windfall sites on Canvey Island at application stage in order to demonstrate no adverse effects on site integrity – we consider that this could be worded more clearly as follows: ‘A Habitats Regulations Assessment will be required for windfall sites on Canvey Island at application stage <b>and will need to</b> <del>in order to demonstrate no adverse effects on site integrity</del> <b>before development can be granted permission</b>’. We advise replacing the former sentence with this wording wherever it occurs throughout the document under different locations.</p>	<p>6.47 A Habitats Regulations Assessment will be required for windfall sites on Canvey Island at application stage <del>in order to</del> <b>and will need to</b> demonstrate no adverse effects on site integrity <b>before development can be granted permission</b>.</p> <p>8.16 A Habitats Regulations Assessment will be required at application stage <del>in order to</del> <b>and will need to</b> demonstrate no adverse effects on site integrity <b>before development can be granted permission</b>.</p> <p>8.26 A Habitats Regulations Assessment will be required at application stage <del>in order to</del> <b>and will need to</b> demonstrate no adverse effects on site integrity <b>before development can be granted permission</b>.</p> <p>8.40 The nature conservation sites at west Canvey are however sensitive to recreational activities and urban development so it is important that the Master Plan deals with this in an appropriate manner. A Habitats Regulations Assessment will be required of the Master Plan and associated development proposals <del>to avoid any</del> <b>and will need to demonstrate no</b> adverse impacts on the integrity of nearby habitats sites or functionally linked land <b>before development can be granted permission</b>’.</p>

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
			<p>8.72 .....A Habitats Regulations Assessment will be required of development proposals <del>to avoid any</del> <b>and will need to demonstrate no</b> adverse effects on the integrity of nearby Habitats sites including from construction impacts as well as occupational impacts, <b>before development can be granted permission.</b></p> <p>8.78 A Habitats Regulations Assessment will be required of development proposals at C10F: Ozonia Gardens and C10G: Land between Station Road and Seaview Road <del>to avoid any</del> <b>and will need to demonstrate no</b> adverse effect on the integrity of nearby Habitats sites or functionally linked land, <b>before development can be granted permission.</b></p> <p>9.23 A Habitats Regulations Assessment will be required of development proposals at B7A: Richmond Avenue Car Park <del>to avoid any</del> <b>and will need to demonstrate no</b> adverse effect on the integrity of nearby Habitats sites or functionally linked land, <b>before development can be granted permission.</b></p> <p>11.17 A Habitats Regulations Assessment will be required at application stage <del>in order to</del> <b>and will need to</b> demonstrate no adverse effects on sites integrity, <b>before development can be granted permission.</b></p>

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
			<p>13.46 A Habitats Regulations Assessment will be required at application stage <del>in order to</del> <b>and will need to</b> demonstrate no adverse effects on sites integrity <b>before development can be granted permission.</b></p> <p>14.28 A Habitats Regulations Assessment will be required of any new development at SEL4 (South Canvey Port Facilities), West Canvey and Canvey Town Centre <del>to avoid any</del> <b>and will need to demonstrate no</b> adverse effects on integrity of nearby Habitats sites or functionally linked land <b>before development can be granted permission.</b></p> <p>14.49 A Habitats Regulations Assessment will be required of any project aimed at attracting large visitor numbers Centre <del>to avoid any</del> <b>and will need to demonstrate no</b> adverse effects on the integrity of nearby Habitats sites or functionally linked land <b>before development can be granted permission.</b></p> <p>17.8 A Habitats Regulations Assessment will be required of any substantial new development within 2km of a Habitats site or Holehaven Creek SSSI (as functionally linked land) <del>to avoid any</del> <b>and will need to demonstrate no</b> adverse effect on the integrity of nearby Habitats sites <b>before development can be granted permission.</b></p>

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
			<p>17.26 A Habitats Regulations Assessment will be required of any substantial new development within 2km of a Habitats site or Holehaven Creek SSSI (as functionally linked land) at application stage, <del>to avoid any</del> <b>and will need to demonstrate no adverse effect on the integrity of nearby Habitats sites before development can be granted permission.</b></p> <p>18.16 A Habitats Regulations Assessment will be required at application stage in order to demonstrate no adverse effects on site integrity. The Riverside Strategy must be subject to a Habitats Regulations Assessment <del>in order to</del> <b>and will need to demonstrate no adverse effects on site integrity.</b> This will need to take into account the Castle Point Plan when considering in combination effects.</p> <p>19.56 A Habitats Regulations Assessment will be required at application stage for any facility near to Benfleet and Southend Marshes SPA or Holehaven Creek SSSI (as functionally linked land) <b>before development can be granted permission, in order to and will need to demonstrate no adverse effects on site integrity.</b></p> <p>20.30 .....Any improvements to the access to Canvey Island must avoid any adverse effects on the integrity of Habitats Sites. A Habitats Regulations Assessment will be required to</p>

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
			<p>demonstrate no adverse effects on site integrity <b>before development can be granted permission.</b></p> <p>20.40 A Habitats Regulations Assessment will be required at application stage <del>in order to</del> <b>and will need to</b> demonstrate no adverse effects on site integrity <b>before development can be granted permission.</b></p> <p>21.32 All developments on Canvey Island will need to avoid any adverse effects on site integrity. A Habitats Regulations Assessment will be required at application stage to demonstrate no adverse effects on site integrity <b>before development can be granted permission.</b></p>
0341	Policy C4 - West Canvey	8.39 states that 'development will integrate with multi-functional green infrastructure in the area such as Canvey Wick SSSI and west Canvey Marshes to provide recreation and time in nature opportunities for residents'. This will need careful consideration to ensure that there are no harmful impacts on the notified features of Canvey Wick SSSI from new development. Please note that	<p>8.39 ..... Furthermore, it is expected that the development will integrate with multi-functional green infrastructure in the area such as Canvey Wick SSSI and west Canvey Marshes to provide recreation and <del>time in</del> nature opportunities for residents, <b>whilst ensuring that there are no harmful impacts on the notified features of Canvey Wick SSSI from new development.</b></p> <p><u>Modifications to Policy:C4</u></p> <p><del>9. Appropriate links into multi-functional green infrastructure to the west of the site whilst avoiding adverse harm to biodiversity</del></p>

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
		assessments on SSSIs are separate considerations from impacts on international sites which are carried out under the Habitats Regulations as mentioned in 8.40.	<p><del>through recreational impacts, or other impacts arising from urban development.</del></p> <p><b>9) Well-designed alternative SANG, to help alleviate pressure on the Essex Coast habitats</b></p> <p><b>10) A strategy that minimizes impacts upon the SSSI and does not impede LNRS aims of connectivity; via sensitive consideration of siting, buffers, lighting and noise. Residential development should be located with suitable buffers and in less sensitive parts of the site to avoid adverse impacts</b></p> <p><b>11) Enhancements that complement the designated features and features of interest of Canvey Wick SSSI. Redevelopment of the adjacent area should factor in features that will support increased biodiversity, in particular scarce and rare invertebrates, via measures such as green roofs, brownfield habitat, sandy planted areas/sandbanks and use of waste material such as crushed concrete in gabion baskets.</b></p>
0341	Policy C5 - Improved Access to and around Canvey Island	We suggest the following changes to the policy wording in point 4 as follows: 'Options in the feasibility study for improvements to access to	<p><u>Modification</u></p> <p>4. Options in the feasibility study for improvements to access to Canvey Island will be subject to Habitats Regulations Assessment <b>that will need to demonstrate</b> <del>to ensure there is</del></p>

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
		Canvey Island will be subject to Habitats Regulations Assessment <b>and will need to demonstrate</b> <del>to ensure there is</del> no adverse effect on integrity to ensure there is no resulting harm to internationally protected sites’.	no adverse effect on integrity to ensure there is no resulting harm to internationally protected sites’.
0341	Policy D3 – Masterplanning:	Paragraph 16.38 states that masterplans should reflect the policy requirements of the Local Plan. In line with Policy SP1 and the wider Plan vision, this should include the need for multifunctional green infrastructure. The masterplan offers an opportunity to outline how GI has been integrated into a scheme to create high-quality, sustainable places. It will also ensure that GI is considered from the outset as an important piece of infrastructure in new developments.	<p><u>Modifications</u></p> <p>16.38 The Council will work with those promoting development, the local communities and infrastructure providers to ensure that Master Plans accurately reflect <b>the vision</b> and the policy requirements in this Plan but also local aspirations and preferences concerning layout, style, character and relationship to adjoining land uses.</p> <p><b>16.39 In line with the wider plan vision, the masterplan offers an opportunity to outline how multifunctional green infrastructure has been integrated into a scheme to create high-quality, sustainable places. It will also ensure that GI is considered from the outset as an important piece of infrastructure in new developments</b></p> <p>Note: subsequent paragraphs in the chapter will need re-numbering as a result of the addition.</p>

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
0341	Policy ENV1 - Protecting and Enhancing the Landscape and Landscape Features	We recommend including a reference to National Character Areas and Local Landscape Character Assessment areas (where datasets for these are available) Natural England - National Character Area Profiles - National Character Area Profiles.	<p><u>Modification: New paragraph in Policy ENV1</u></p> <p><b>4. Development proposals should be designed to reflect character, features and priorities of established Landscape Character Areas and landscape assessments</b></p> <p><u>Modification: New Reasoned Justification Paragraph</u></p> <p><b>18.6 The Natural England <u>National Landscape Character Areas</u>, as well as local Essex Landscape Character Assessments provide a way of understanding how the landscape and its elements contribute to local character, sense of place, and local distinctiveness can be preserved and enhanced. Canvey and southern areas of the Borough form part of the Thames Estuary Landscape Character Area, while northern parts of the Borough form part of the Northern Thames Basin/South Essex Coastal Towns Landscape Character Area</b></p>
0341	Policy ENV3 – Securing Nature Recovery and Biodiversity Net Gain	We agree that ‘Where appropriate, large scale residential developments within the Zones of Influence will be required to provide sustainable accessible natural greenspace (SANG) or SANG like provision’.	<p><u>Modification: Addition to Policy ENV3 paragraph 1a and b</u></p> <p>a. Applying the principles related to the biodiversity mitigation hierarchy, Sites of Special Scientific interests (SSSI) and irreplaceable habitats set out in national planning policy, <del>In Castle Point, including ancient woodlands are considered to constitute irreplaceable habitats</del></p>



Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
		<p>This should be defined as providing a minimum of 8Ha per 1000 new population of accessible semi-natural greenspace with a minimum 2.7km circular walk on-site or on-site and making use of the existing Public Rights of Way network. Note that the Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) is in the process of being updated (section 18.23) and the supporting text should refer to future iterations of this strategy. We are pleased to see reference to SSSIs. Given point 1a covers irreplaceable habitats and SSSIs, should it refer to the mitigation hierarchy rather than the biodiversity hierarchy which prioritises steps for BNG delivery (onsite first, offsite, and</p>	<p>b. .... Where appropriate, large scale residential developments <b>(500 units + or equivalent)</b> within the Essex Coast Zone of Influence will be required to provide <del>sustainable</del> <b>Suitable Accessible Natural Greenspace (SANG)</b> or SANG-like provision. <b>This should be defined as providing a minimum of 8Ha per 1,000 new population of accessible semi-natural greenspace with a minimum 2.3km circular walk on-site. Alternatively, developments may be able to contribute to the uplift an existing greenspace (e.g. a Country Park) to SANG standard. and making use of the existing Public Rights of Way network.</b></p> <p><u>Modification: Paragraph 18.23</u></p> <p>18.23 A Recreational <del>d</del>Disturbance Avoidance and Mitigation Strategy (RAMS) has been prepared <del>for the Essex Coast Habitats Sites to address this</del> cooperatively across Essex. This, <b>together with any future updated iterations</b>, sets out a series of actions to be taken to avoid adverse <b>in-combination</b> effects <b>upon Essex Coast Habitats Sites</b> <del>to these habitats</del>. The Strategy identifies a Zone of Influence (ZOI) around each Habitats sites in Essex where recreational disturbance is likely to result from residential development.</p>

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
		<p>statutory credits as a last resort)?</p> <p>We welcome point 1d(ii) and the 20% target for development on greenfield land. This aligns with the wider Essex ambitions for 20% Biodiversity Net Gain to support nature recovery and delivery of the LNRS.</p> <p>We welcome the inclusion of an Urban Greening Factor in the Plan. The UGF can work alongside BNG, ensuring that developments provide a biodiversity / greening uplift even where the BNG baseline is low. Public realm improvements (as noted in para 16.15) would also offer urban greening opportunities for Castle Point.</p>	<p>Modification: Merge Paragraph 18.24 into 18.23 together as they both address RAMs. This allows for the creation of a new paragraph 18.24 to address SANG (see below)</p> <p>New para: <b>18.24: The RAMS tariff addresses in-combination adverse effects on the integrity of the Essex Coast Habitats Sites. However, large sites (500+) with alone adverse effects from recreational disturbance will also need to mitigate via on-site SANG (Suitable Alternative Natural Greenspace) provision at a rate of 8ha/1000 new population, as recommended by Natural England following receipt of updated Visitor Survey evidence by Footprint Ecology on behalf of the Essex Coast Partner LPAs. SANGs are areas that are designated with the aim of protecting ecologically sensitive protected sites like Special Protection Area (SPA) from recreational disturbance/pressures by providing alternative green space for people to visit. SANG need to conform to the latest Natural England SANG guidelines (add link to SANG guidelines on CPBC website). Where SANG or equivalent is provided, the RAMs tariff still applies, because in such cases, the Essex RAMS tariff mitigates for residual effect of these large sites, as no amount of on-site greenspace will prevent all visits to the coast, nor is that desirable.</b></p>

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
			<p><u>New addition to Glossary</u></p> <p><b>SANG (Suitable Alternative Natural Greenspace) - A strategically planned high quality semi-natural green space designed to draw recreational visitors away from ecologically sensitive protected sites such as SPAs (Special Protection Areas), thereby reducing development impacts. SANGs may include green or blue infrastructure and serve a multi-functional role, for example: provision of SuDS, climate change mitigation and enhancing public health and wellbeing.</b></p>
	Policy C1 - Canvey Town Centre	Clarification to relevant site policy (necessary in light of above amendment to Policy ENV3 SANG policy).	<p><u>Modification to Policy C1(14)</u></p> <p>Policy C1(14). Development proposals must <b>satisfy the requirements of the habitats regulations and</b> must be designed to enable and support the habitat priority measures identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).</p>
	Policy Thun2	Clarification to relevant site policy (necessary in light of above amendment to Policy ENV3 SANG policy).	<p><u>Modification to Policy Thun2(7)</u></p> <p>Policy Thun2(7). <b>Development proposals should satisfy the requirements of the habitats regulations by providing sustainable accessible natural greenspace (SANG) or SANG-like provision in accordance with Policy ENV3. Development must also</b> be designed to enable and support</p>

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
			the habitat priority measures identified within the Strategic Opportunities set out in the Essex Local Nature Recovery Strategy (LNRS).
	Policy SD1 - Tidal Flood Risk Management	<p>Natural England wishes to remind Castle Point that any flood risk projects which have the potential to impact SPA features will require an HRA to ensure that they do not damage designated features or impact SSSI species and habitats. We note the risks to biodiversity and ecology from climate change are identified in section 21.3 and welcome efforts to manage these impacts. Section 21.18 identifies the potential for intertidal marshland habitat loss that may require compensatory measures. Natural England would like to be consulted at the earliest stage to ensure that any compensatory measures are sufficient.</p> <p>We also encourage Castle Point to identify compensatory sites</p>	<p><u>Modification: Paragraph 21.18</u></p> <p>Local Plan 21.18 The loss of inter-tidal marshland habitats. The Benfleet and Southend Marshes is designated as a Special Protection Area (SPA) and is recognised for its assemblage of migratory birds under the Ramsar Convention. As a consequence, there is a need to identify compensatory habitat. The TE2100 Plan seeks to identify compensatory provision to account for this loss. <b>Natural England's early input will be sought to ensure that any compensatory measures are sufficient. Habitats created as compensatory measures will require a robust long-term monitoring programme to ensure continued functionality.</b> Any development within Hadleigh Marshes should avoid causing adverse effects on sites integrity. This will need to be demonstrated through a project level Habitats Regulations Assessment.</p>

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
		<p>early as there are high levels of competition for suitable sites in and around the Thames estuary. Ideally, we would rather flood management measures avoid the loss of designated habitat entirely, but Natural England recognise that this may not be feasible given the local area. It may be necessary to explore habitat creation options as a compensatory measure and there will need to be a comprehensive plan for any such proposals including a robust long-term monitoring programme to ensure that compensatory measures are functioning effectively.</p> <p>Note: Similar comments were also made by NE in their response to the HRA.</p>	
	Policy SD9 – Water Supply	Natural England welcomes the requirements for new development to incorporate	CPBC have commissioned consultants to prepare a Water Capacity Assessment. This work is programmed from completion in Q1 2026. CPBC will continue

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
	and Waste Water	<p>water efficiency measures and achieve stringent standards. Useful reference can be made to the recently published Shared Standards for Water Efficiency in Local Plans. The Standards set out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex &amp; Suffolk Water, Affinity Water, the Environment Agency and Natural England, with the full endorsement of Water Resources East (WRE) as part of strengthening the Regional Water Resources Plan for Eastern England.</p> <p>It is your authority's responsibility to determine that the Local Plan meets the statutory obligations for nature recovery, set out in Annex D of the Standards. We advise that implementation of the recommendations in the Shared Standards are one way for your</p>	<p>to keep NE informed of this additional work. This will supplement the Shared Standards for Water Efficiency in Local Plans.</p> <p>Modification to Policy SD9:</p> <ol style="list-style-type: none"> <li>1. All new residential development will be required to achieve a water efficiency standard of <b>85 90-litres per person per day of mains supplied water/potable water per person per day</b>. <del>Where it can be demonstrated that this is no feasible part G2 and regulation 36(2)(b) of the Building Regulations will apply.</del></li> <li>2. <del>All non-residential development should achieve full credits for Wat 01 of BREEAM.</del> <b>New, extended or redeveloped non-household ('non-household' means all development except residential dwellings) buildings aim to achieve full credits within the 4 water categories (WAT01, WAT02, WAT03, and WAT04) for BREEAM standard within a minimum score of 3 credits within WAT01 Water Consumption issue category, or an equivalent standard set out in any future update to BREEAM. The applicant will be required to justify and evidence why full credits is not possible/viable for the development.</b></li> </ol>

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
		<p>authority to meet its nature recovery and protection obligations, in relation your plans for growth and water scarcity. This includes undertaking an integrated water cycle study to inform the local plan and assess the need for the water efficiency measures in your LPA area to address the impacts of growth on nature recovery obligations.</p> <p>Recommended policy wording around water efficiency, for inclusion in Local Plans, is set out in the Shared Standards.</p> <p>We support the policy requirement that all new development should demonstrate that adequate foul water treatment and drainage already exists or can be provided in time to serve the development.</p> <p>The policy stipulates that this must include confirmation that</p>	<p>New paragraph as follows</p> <p><b>5. A Water Efficient Design Statement should be submitted with the application at the earliest stage to demonstrate how policy requirements have been met and will be maintained in relation to water efficient design. The statement shall provide, as a minimum, the following:</b></p> <p><b>a) Baseline information relating to existing water use within a development site; and</b></p> <p><b>b) Calculations relating to expected water use within a proposed development (such as water efficient fixtures and fittings, rainwater/stormwater harvesting and reuse, or greywater recycling).</b></p> <p>A new paragraph to be added to the reasoned justification:</p> <p><b>The Shared Standards in Water Efficiency for Local Plans (June 2025) set out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex &amp; Suffolk Water, Affinity Water, the Environment Agency and Natural England, to provide advice and evidence to Local Planning Authorities (LPAs) on how they can secure higher</b></p>

Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
		there is adequate quantitative and qualitative capacity at the Water Recycling Centre that will serve the development.	<b>water efficiency standards for new homes and commercial developments.</b>
Policy Infra4 – Open Spaces		<p>We support the need for standards to ensure the adequate provision of open space in Castle Point. The design of new open space should be informed by local needs and opportunities, and provision should be sufficient to meet the requirements of new communities. As a baseline, Natural England recommends a standard of 3Ha of accessible greenspace per 1000 people, with no net loss or reduction in this capacity.</p> <p>A higher level of provision of 8Ha of accessible greenspace per 1000 people may be needed where there are recreational pressure concerns on coastal Habitats Sites.</p>	<p>Broad support for open space standards noted</p> <p>Modifications proposed as follows:</p> <p><u>New addition to Policy Infra4</u></p> <p>6. New open spaces will be required for major developments on grey belt sites and greenfield sites in the urban area, <b>according to the Council's Open Space Needs Assessment quantity, access and quality standards</b>. <del>This</del> <b>These</b> will be required where there is a deficiency (by quantity or access) of open space types, or where the implementation of the development itself will lead to a deficiency. The benchmark scale of development that is normally expected to provide equipped/designated open spaces on site is as follows:</p> <p><u>Modification to supporting text</u></p> <p>19.52 The Castle Point Open Space Needs Assessment <del>recommends</del> standards for ensuring there is an adequate provision of open space across the Borough over the Plan</p>



Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes																																
			<p>period <b>are set out below.</b> <del>It</del><b>The assessment</b> establishes quality standards for a whole range of different types of open spaces, and quantity and accessibility standards for the most common types of open space. <b>Meeting these standards will also ensure that Natural England's 3ha/1000 population accessible greenspace standard is achieved.</b></p> <p>Add Title to Table 'Table x: Open Space Needs Assessment Quantity, and Access Standards'</p> <p>Delete final column in table 'Additional open space to be delivered .....')</p> <table> <tr> <th>Typology</th><th>Quantity standards (ha/1,000 pop)</th><th>Access standard (walking time, straight line)</th><th>Additional open space to be delivered over the Plan period</th></tr> <tr> <td>Allotments</td><td>0.2</td><td>15 mins (720m)</td><td>2.45 Ha</td></tr> <tr> <td>Amenity Green Space (sites &gt;0.1 Ha)</td><td>0.6</td><td>10 mins (480m)</td><td>7.43 Ha</td></tr> <tr> <td>Parks and Recreation Grounds</td><td>1.1</td><td>15 mins (720m)</td><td>13.46 Ha</td></tr> <tr> <td>Play Space (Children)</td><td>0.7</td><td>10 mins (480m)</td><td>0.87 Ha</td></tr> <tr> <td>Play Space (Youth)</td><td>0.7</td><td>15 mins (720m)</td><td>0.87 Ha</td></tr> <tr> <td>Accessible Natural Green Space</td><td>1.80</td><td>15 mins (720m)</td><td>22.03 Ha</td></tr> <tr> <td>Total for new provision</td><td>3.84</td><td></td><td>47.02 Ha</td></tr> </table>	Typology	Quantity standards (ha/1,000 pop)	Access standard (walking time, straight line)	Additional open space to be delivered over the Plan period	Allotments	0.2	15 mins (720m)	2.45 Ha	Amenity Green Space (sites >0.1 Ha)	0.6	10 mins (480m)	7.43 Ha	Parks and Recreation Grounds	1.1	15 mins (720m)	13.46 Ha	Play Space (Children)	0.7	10 mins (480m)	0.87 Ha	Play Space (Youth)	0.7	15 mins (720m)	0.87 Ha	Accessible Natural Green Space	1.80	15 mins (720m)	22.03 Ha	Total for new provision	3.84		47.02 Ha
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Rep Number	Local Plan Reference	Summary of representation/discussion	Agreed response and Reasoned Justification Changes
			<p><u>Amendments/Additions to Supporting Text</u></p> <p>19.56 A Habitats Regulations Assessment will be required at application stage for any facility near to Benfleet and Southend Marshes SPA or Holehaven Creek SSSI (as functionally linked land), in order to demonstrate no adverse effects on site integrity. <b>Where 8Ha per 1,000 new population of on-site SANG is required under Policy ENV3, this will replace the requirement for the Accessible Natural Green Space element of open space requirements detailed in Table x above.</b></p> <p><b><u>General SoCG Comment:</u></b>  <b>As set in policy ENV3 above,</b> CPBC remains committed to RAMs <b>and the requirement for SANG</b> on larger residential developments through the HRA process in recognition of the recreational pressure concerns on coastal Habitats Sites. CPBC is one of 12 LPAs which uses the Essex RAMs SPD. This requires all new development to pay a tariff which is aimed at mitigating the effects of visitor pressure on coastal habitats sites.</p>

Comments on the HRA

Rep Number	Local Plan Reference	Summary of representation	Agreed response and Reasoned Justification Changes
0341	HRA	<p>We agree with the policies and allocations screened in for appropriate assessment (AA).</p> <p>As indicated in section 2.3.2 of the report, Natural England has previously advised that it is satisfied with the conclusions of the HRA Scoping Report (Place Services, May 2024) with regards to the relevant Marine Protected Areas (MPAs). The Scoping Report considered that “a Marine Conservation Zone Assessment for the Blackwater, Crouch, Roach and Colne Estuaries Marine Conservation Zone (MCZ) is not currently required due to the distance between the Castle Point LP Area and the MCZ (Over 4km) and development within the Local Plan boundary is unlikely to impact the MCZ features”.</p> <p>We note that the AA has made a number of recommendations to enable the Plan to avoid adverse effects on the integrity of any Habitats sites, either alone or in combination with other plans and projects, which have been incorporated into the Plan. Section 7.1.3 states: The Local Plan has embedded mitigation within the Reasoned Justification for SD1 to avoid Adverse Effects on Integrity from planned tidal flooding stemming from the Thames 2100 Plan, as this is supported by Policy SD1. It is recognised that compensation will be required for the loss of terrestrial habitat within Benfleet and Southend Marshes SPA and Ramsar Site.</p>	<p>21.13 - The TE2100 Plan, prepared by the Environment Agency and partners, sets out a policy for the maintenance and improvement of the sea defences on Canvey Island in line with climate change projections. Improvements have already been delivered to the Island’s southern revetments and will be required over the next 40 years to keep up with climate change. The Council will work with the Environment Agency to ensure that these ongoing improvements are delivered. Any works to retain or enhance sea walls, or within the 19m safeguarded buffer zone, should <b>prioritise avoiding the loss of designated habitat or</b> causing adverse effects on site integrity. This will need to be demonstrated through a project level HRA.</p> <p>Also See modifications to paragraph 21.18 in the table above that derive from Natural England’s comments on the</p>

		<p>Natural England would prefer that flood management measures avoid the loss of designated habitat entirely, but Natural England recognise that this may not be feasible given the local area. Identification and development of compensatory habitat is a complex and resource intensive process and Natural England would like to be consulted at as an early a stage as possible to ensure that any compensatory measures are sufficient. We would encourage Castle Point to identify compensatory sites well in advance as there are high levels of competition for suitable sites in and around the Thames estuary. It may be necessary to explore habitat creation options as a compensatory measure and there will need to be a comprehensive plan for any such proposals including a robust long-term monitoring programme to ensure that compensatory measures are functioning effectively. The report concludes that adverse impacts upon water quality can be achieved through the delivery of the Asset Management Plans of the water supply company and the drainage undertakers, through the use of SuDS and ensuring that Water Recycling Centres (WRCs) have the capacity to accommodate growth. Natural England is satisfied with this, noting Policy SD9 water supply and waste water requirements; in particular, that all new development should demonstrate that adequate foul water treatment and drainage already exists or can be provided in time to serve the development including confirmation that there is adequate quantitative and qualitative capacity at</p>	<p>Castle Point Plan as well as NE's comments on the HRA.</p>
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		the WRC that will serve the development. We agree with the other mitigation measures that have been put forward (see 7.1.6) including the requirement for 'down-the-line' assessment (7.1.7) using the best available evidence (7.1.8).	
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<b>Comments on the SA/SEA</b>			
<b>Rep Number</b>	<b>Local Plan Reference</b>	<b>Summary of representation</b>	<b>Agreed response and Reasoned Justification Changes</b>
0341	SA/SEA	<p>We have been unable to review this in great detail but we have the following comments and observations:</p> <p>We agree with the findings in 6.2.2 that there is a mix of positive and negative effects for the biodiversity objective. We note that impacts on biodiversity are highlighted as uncertain to negative for some sites and mitigation may be required to make proposals acceptable. Down-the-line project level assessments will be required to develop mitigation measures in greater detail.</p> <p>We note that ‘Cumulative negative ‘in-combination’ and trans-boundary effects may stem from the potential level of growth in the Plan area and growth across Essex as a whole’ (6.2.3). Please note that the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) which is set up to account for the ‘in combination’ effects of new housing on coastal Habitats site is currently being reviewed and will be updated with the current findings.</p>	Comments noted.

## **7. Areas Without Agreement (Uncommon Ground)**

**6.1**      There are no areas without agreement.

## **8. Ongoing Cooperation**

8.1 CPBC and Natural England have met their duty to cooperate in the production of the Plan

8.2 CPBC will continue to engage with NE throughout the examination of the Castle Point Plan and through its role as a statutory consultee for plan making and planning applications, through participation at relevant subregional level events including RAMS meetings in addition to the matters previously highlighted in paragraph 2.1.



## Signatories



For and on behalf of Castle Point Borough Council:

**Name and Position:** Amanda Parrott, Assistant Director, Climate and Growth

**Date:** 9 January 2026



For and on behalf of Natural England

**Name and Position:** Fiona Martin, Senior Officer for Strategic Solutions,  
Sustainable Development – West Anglia Team

**Date:** 23 January 2026



**Statement of Common Ground**

**Castle Point Plan 2026 to 2043**

**Regulation 19 Pre-Submission Draft**

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**Between**

-

**Castle Point Borough Council**

**and**

**Essex County Council**

**Castle Point Local Plan 2026 to 2043**

**Date: February 2026**

## 1. Introduction

- 1.1. This Statement of Common Ground identifies areas of agreement and disagreement between Castle Point Borough Council (CPBC) and Essex County Council (ECC) in relation to the Castle Point Plan 2026-2043 and supporting evidence base.
- 1.2. This statement has been prepared to assist the examination of the Castle Point Plan. ECC made representations to the Regulation 18 Consultation - Issues and Options and the Regulation 19 Publication of the Plan drafts published for consultation between 22<sup>nd</sup> July 2024 to 16<sup>th</sup> September 2024 and 1<sup>st</sup> August 2025 to 26<sup>th</sup> September 2025 respectively. ECC confirmed their response to the Regulation 19 Draft during the further consultation on 3<sup>rd</sup> December 2025, alongside a letter confirming the position on North West Thundersley as agreed with CPBC in the specific Statement of Common Ground.
- 1.3. The Castle Point 1998 Adopted Local Plan together with the adopted Essex Minerals Plan (2014) and Essex and Southend-on-Sea Waste Local Plan (2017) form the development plan for the Borough. The Castle Point Plan will cover the period of 2026 to 2043 and aims to grow with a focus on regeneration, brownfield redevelopment and increased density in urban areas whilst protecting its green belt and ensuring that growth is climate resilient and supported by essential infrastructure.

## 2. Duty to Cooperate

- 2.1. The councils of Basildon, Brentwood, Castle Point, Rochford, Southend on Sea, Thurrock and ECC formed a strategic partnership in 2017 to develop a long-term growth ambition which would underpin strategic spatial, infrastructure and economic priorities in South Essex. The collaboration was underpinned by a Memorandum of Understanding (MoU) signed in January 2018<sup>1</sup> creating the Association of South Essex Local Authorities (ASELA). In 2023 the leaders and Chief Executives agreed to refresh the identity for the partnership which is now known as South Essex Councils (SEC). The SEC's core purpose is to provide leadership for South Essex and to deliver a vision for the region up to 2050<sup>2</sup> in order to promote healthy growth for South Essex Communities. This is achieved

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<sup>1</sup> [https://www.basildon.gov.uk/media/8838/South-Essex-Joint-Strategic-Plan-Statement-of-Common-Ground-June-2018/pdf/South\\_Essex\\_Joint\\_Strategic\\_Plan\\_-\\_Statement\\_of\\_Common\\_Ground\\_-\\_June\\_2018.pdf?m=1545315901647](https://www.basildon.gov.uk/media/8838/South-Essex-Joint-Strategic-Plan-Statement-of-Common-Ground-June-2018/pdf/South_Essex_Joint_Strategic_Plan_-_Statement_of_Common_Ground_-_June_2018.pdf?m=1545315901647)

<sup>2</sup> <https://www.southessex.org.uk/opportunity-south-essex>

through collaboration, by sharing resources, joint evidence and by lobbying government.

2.2. The SEC is supported by the South Essex Joint Officers Group which both CPBC and ECC officers attend, and the group meets monthly. Through joint working shared evidence is prepared and strategic issues along with local plan preparations are discussed.

2.3. At a county level the Essex Planning Officers Association (EPOA) represents officers from all 15 local authorities including ECC. Planning heads from each local authority meet several times a year to provide leadership and discuss strategic matters across all of Essex. Terms of reference including governance for this decision-making body was agreed in December 2020<sup>3</sup>. There is also a Planning Policy Group, which is currently chaired by CPBC.

2.4. CPBC also has one to one monthly meetings with ECC to consider any specific cross border strategic matters, to provide updates on the preparation of evidence (including shared) and with regards the progress of the local plan and relevant ECC plans and guidance.

2.5. CPBC has fully engaged with ECC on the preparation of the Castle Point Plan from the outset with regards its role as:

- Minerals and Waste Planning Authority
- Highway and Transportation Authority
- Lead authority for education (including early years and childcare)
- Lead Local Flood Authority
- Providing and delivering supported and specialist housing (including Adult Social Care) and public health services
- Leading work on climate change and net zero carbon and green and blue infrastructure
- ECC's role as Responsible Authority for the Essex Local Nature Recovery Strategy (ELNRS).

2.6 In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, ECC has been formally consulted at both Regulation 18 and 19 stages of consultation together with the accompanying Strategic Environmental Assessment (SEA) and Sustainability Appraisal; Habitats Regulation Assessment and Equality Impact Assessment. In addition, CPBC and ECC have maintained a programme of Duty to Co-operate (DtC) officer meetings on a monthly basis to discuss strategic and cross boundary issues.

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<sup>3</sup> [Chief Officers' Group and EPOA Partnership - Terms of Reference](#)

### **3. Strategic and cross boundary matters identified and discussed between CPBC and ECC**

- Delivering homes for all including Gypsy and Traveller accommodation and Specialist and Supported Housing
- Jobs and economy including green employment and regeneration
- Retail, leisure, and cultural development
- Sustainable transport, highways and active travel
- Climate change action and mitigation including flood risk and zero carbon development
- Natural and historic environment including increased biodiversity and green/blue/wild spaces and connectivity of ecological networks
- Community infrastructure including health and community facilities (including libraries)
- Education (including primary, secondary, early years education and childcare, post 16 and SEND)
- Utility infrastructure including communications, waste, water and energy

### **4. Common Ground**

- 4.1. Statements of Common Ground (SoCG) set out how strategic matters or issues of a common nature between a local authority and a statutory body or organisation are being addressed and progressed throughout the plan-making process to provide transparency, and wherever possible, show where parties are working towards areas of agreement.
- 4.2. ECC submitted a large number of detailed and helpful comments in response to the Preferred Options consultation (Regulation 18) and Regulation 19 consultation, on a wide range of issues. A full schedule of all the comments to the Regulation 19 consultation is attached to this statement at Appendix 1. The majority of the recommended modifications by ECC have been incorporated into the Schedule of Modifications which will be submitted alongside the Castle Point Plan including those summarised below:

#### **AREAS OF COMMON GROUND**

- 4.3. Support has been expressed for the following areas of the Castle Point Plan (Regulation 19).
- Policies ENV1, 2, 3, 4, 5 The Green Infrastructure Objectives protecting green spaces and multifunctional green and blue infrastructure supported by the ELNRS (Rep Numbers 4, 39 and 64)
  - Reference in policies to maximise opportunities for safe and convenient active travel routes (walking and cycling routes) (Rep Numbers 21 and 102)
  - Policy C5 Improved Access to and around Canvey Island with regards ECC involvement in any future Canvey Island improved access feasibility study. (Rep Number 27)

- Policy C1 – reference to access to Thorney Bay Pavillion (Rep Number 23)
- Policy HAD2 requiring proposals to improve recreational improvements at Hadleigh Country Park (Rep Number 38)
- Policy HOU4 Specialist Housing Requirements regarding Criteria 1a (accessibility standards), 2c (specialist accommodation for vulnerable adults) and d(residential care homes for children (Rep Number 47 to 49)
- Policy HOU6 Approach to Gypsy and Traveller Accommodation (Rep Number 52)
- Policy D1 Design Objectives - supports the provision of more and enhanced pedestrian and cycle routes including having regard to the Castle Point Local Cycling and Walking Infrastructure Plan (LCWIP) and the Essex Wide LCWIP
- Policy ENV2 Coastal and Riverside Strategy (Rep Number 77, 78 and 79)
- Policy SD1 Tidal Flood Risk management including land buffer to existing flood defences on Canvey Island (Rep Number 114)

Recommended policy and reasoned justification amendments put forward by ECC have been incorporated by CPBC into the Schedule of Modifications to the Castle Point Plan consistent with the recommended changes set out in Appendix 1. The key amendments are summarised below:

- Context Policy Content. Paragraph 2.5-2.6 –sets out the role of ECC as the Minerals and Waste Planning Authority for Castle Point Borough; the need for development to undertake a Mineral Resource Assessment if located in a Minerals Safeguarding Area (MSA); a Mineral Infrastructure Impact Assessment within specified thresholds of a Mineral Consultation Area; and a Waste Infrastructure Impact Assessment within the specified thresholds of a Waste Consultation Area (WCA) (Rep Number 1).
- References to the Essex Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA) (2025) in the Vision and Objectives and SP3 Meeting Development Needs, Hou4 Specialist Housing Requirements, D1 Design Objectives, INFRA1 Community Facilities, T3 Active Travel, Monitoring Objective 16 and 18, Equality Impact Assessment (Rep Number – 2, 14, 47, 48, 49, 63, 84, 101, 134, 135, 136 and 146)
- Strategic Policy SP1, Criteria 1 – CPBC and ECC have a strengthened biodiversity duty under the Environment Act 2021 to have regard to the Essex LNRS in preparing and implementing the plan. Reference in SP1 and policies regarding Canvey (Policy C1, C4, C6, C8 and C9); South Benfleet (B1, B4, B7, B8 and B9); Hadleigh (Had1, Had2, Had3); Thundersley (Thun2); Daws Heath (DH1); Policy E1- Development on Strategic Employment Land; Policy ENV2 – Coastal and Riverside Strategy; and Policy ENV4 - Local Wildlife and Geological Sites to be amended from referencing that Strategic Combined Opportunity Areas should be either ‘safeguarded’ or ‘enable and support’ to ‘protected and enhanced’ in SP1 and ‘protect and enhance’ in the other policies identified above.’ (Rep Number 5)

- References to ‘urban greening’ in SP1 Supporting and Enhancements of Green spaces; SP2 Making Effective Use of Urban Land and Creating Sustainable Places; C4 West Canvey, B8 Manor Trading; B1 South Benfleet Town Centre; HAD1 Hadleigh Town Centre; and THUN1 Thundersley Centre (Rep Number 6, 11, 26, 35, 29, 37 and 40),
- SP4 Developer Contributions - requirement for developers to make direct or proportionate developer contributions and to clarify that the Infrastructure Delivery Plan is a “living document”. (Rep Number 17 and 18)
- Policy C1 – Canvey Island Town Centre - reference to naturetownsandcities.org (Rep Number 19)
- Policy C1 - reference is made to the Paddocks site acting as a community hub supporting skills development of the local community. (Rep Number 21)
- Policy C4 West Canvey – at the request of CPBC, ECC has undertaken a further assessment to identify primary, secondary, early years education and childcare and SEND provision arising from the full policy requirement of 2,700 homes rather than the 2,000 homes in the Plan period, as previously assessed. An Addendum (January 2026) sets out the revised requirements which have been incorporated into Appendix 1, the Schedule of Modifications to Policy C4 and the IDP update. These requirements will provide a more robust basis for future site master planning. (Rep Number 25)
- Policy B6 Church Road Benfleet – additional criteria requiring a Waste Infrastructure Impact Assessment to be undertaken given the proximity to the Armstrong Road Waste Consultation Area (Rep Number 33)
- Policy Thun2 – Kiln Road Campus – the additional assessment confirms the need for a new 56 place early years and childcare nursery and the land required is amended from 0.13 ha to 0.18 hectares consistent with the ECC Developers’ Guide for Infrastructure Contributions (2025). (Rep Number 42)
- Policy Hou4 – Specialist Housing Requirements - the tenure split for retirement/sheltered and extra care housing contained in a report Specialist and Supported Housing and Accommodation Needs Assessment (SSHANA) was updated by ECC in December 2025. Given concerns by CPBC regarding scheme viability arising from discussion with local providers the policy requires proposals to have regard to the findings of the SSHANA, 2025\* at the planning application stage. (Rep Number 48)
- Policy D3 Master planning – masterplans covering key growth areas and site allocations are required to be approved by CPBC prior to submission of a planning application. (Rep Number 53)
- Policy E3 Development of Local Needs – reference to the Essex and Thurrock Skills and Improvement Plan and Employment and Skills Plans (Rep Number 54 and 55)
- Policy TC5 - amendments to provide clarity and reference to key strategies including the Essex Healthy Weight Strategy. (Rep Number 57 – 62)
- Policy D2 Design on Larger Sites and within Premium – clarification is provided regarding the definition of sustainable criteria in relation to bus services/locations. (Rep Number 69)

- Policy D4 Landscaping - reference is included to the Essex Design Guide - Highways Technical Manual - Planting in Sight Splays. (Rep Number 71)
- Policy GB1 – Development affecting the Green Belt – clarification is provided regarding inappropriate development only being supported in the Green Belt in very special circumstances. (Rep Number 74)
- Policy C1, C4, B6, B8, Had1, Thun2, T7 – reference is made to the Essex Parking Guidance prepared by EPOA to ensure consistent terminology. (Rep Number 36, 107, 108, 109)
- INFRA3 Improving health and Wellbeing – amendments to provide clarity and reference key strategies including the Castle Point and Rochford Health and Wellbeing Strategy. (Rep Number 90)
- Policy Infra6 Communications and Infrastructure – reference to encourage the use of existing masts, buildings and other structures and to ensure new site equipment is sympathetically designed and camouflaged. (Rep Number 94)
- Policy T3 - Active Travel Improvements – reference to ensure that provision of active travel infrastructure is provided for the whole community, including those who are less able, and are at risk of social isolation. (Rep Number 101)
- Policy T6 Safe Access - reference to development being required to have regard to the School Design Guidance (May 2025) in the Essex Design Guide (Rep Number 106)
- Policy T8-Access for servicing – the definition of regular servicing to be considered on a case-by-case basis (Rep Number 110)
- Policy SD1 Tidal Flood Risk management ensuring consistency with Policy ENV2 – Coastal and Riverside Strategy (Rep Number 115)
- Policy SD2 - Non-Tidal Flood Risk Management – development will be required to submit a drainage strategy if located within a Critical Drainage Area to demonstrate how surface water flooding on site will be managed having regard to the Sustainable Drainage Systems Guide for Essex. (Rep Number 116)
- Policy SD4 Net Zero Carbon Development – to be retitled and policy wording amended to be consistent with the published EPOA Planning Policy Statement – Policy GE1- Operational Energy and Carbon (Net Zero) in homes and buildings (October 2025). Support the deleted reference to development not being required to meet these standards in exceptional standards in the first five years of development, as the policy is supported by viability evidence. (Rep Number 118)
- SD5 Embodied Carbon – to be retitled and policy wording amended to be consistent with the published EPOA Planning Policy Statement- Policy GE 2 Embodied Carbon and Circular Economy in homes and buildings (October 2025). (Rep Number 122)
- Policy SD9 – Water Supply and Waste Water – reference to require all new residential development achieve a water efficiency standard of 85 litres per person per day of mains supplied water/potable water and the deletion of reference to Building Regulations as an alternative standard. Incorporation of the non-residential standards and requirement to submit a Water Efficient Design Statement as recommended by the ‘Shared Standards in Water Efficiency for Local Plans (June 2025)’, a joint initiative by Natural England, the Environment Agency, water companies and endorsed by Water Resources East (Rep Number 126 to 132)



- Chapter 22 – Monitoring Framework – amendments to objective 6 (buildings designed to lower embodied carbon and meet upfront embodied carbon emissions targets); objectives 16 and 18 (homes built to standard M4(3); annual delivery of retirement/sheltered homes and extra care units by tenure and objective 19 (Health Impact Assessments including for Hot Food Take Away and number of applications refused for Hot Food Take Away) (Rep Number 133 to 137)
- Policies Map – to display Mineral Safeguarding Areas; to remove school playing fields as public open space; and to show existing school sites as allocated for educational use (Rep Number 138 and 139)
- Infra 1 - Community Facilities – deletion of references to education uses being defined as community use and subject to Policy Infra1. Clarification is provided that libraries should be included within ‘community’ use rather than education, as stated in the Reg 19 response. (Rep Number 145)
- Requirement to update the Level 1 and 2 SFRA to incorporate reference to Sustainable Drainage Systems Design Guide for Essex (2020) (Rep Number 149, 150, 156)

**Areas without agreement**

Appendix Item 13	Local Plan Reference	Summary of Representation
<b>Rep No:</b>	Policy SP3 – Meeting Development Needs, Page 25	<p>Considers the Castle Point Plan does not meet the full Standard Methodology Housing Need requirement outlined in NPPF, but notes that there are notable environmental constraints including Green Belt, International and National designations, flood risk and highway and junction capacity issues.</p> <p>Comments that Castle Point has had DtC meetings and made requests to its neighbouring authorities to assist with its unmet housing needs and no opportunities have come forward outside its boundaries to meet its unmet need. Recommends SoCGs are prepared with neighbouring authorities in advance of submitting the Plan for examination to demonstrate appropriate efforts to engage have been undertaken consistent with NPPF.</p> <p>Notes that evidence has been put forward to support CPBC housing strategy of not meeting its full standard method requirement but seeks clarification regarding its robustness and transparency, including .</p> <ul style="list-style-type: none"> <li>• how circumstances have changed to previously allocated sites in the Green Belt, that are no longer considered suitable for development, as evidenced by the Green Belt assessment,</li> <li>• the weight and justification of “severe” impact of growth on the network to determine the deliverability of sites in the Green Belt, and</li> <li>• the weight applied to Strategic Combined Opportunity Areas for biodiversity, as set out in the Essex Local Nature Recovery Strategy (ELNRS), given reference to ‘<i>safeguarded</i>’ in Policy SP1 and ‘<i>enable and support</i>’ in other plan policies.</li> </ul>
<b>CPBC response</b>		
<p>The Housing Need, as defined by the Government’s Standard Methodology for Castle Point the plan period of 2026-2043 is 11,662, which equates to an average of 686 dwellings per annum (May 2025). Castle Point is 17.4 square miles in size with a population density of 4,976 per square mile. Over half of the borough is designated Green Belt and the majority of the borough is low lying land below sea level resulting in 45% of it in flood zone 3. Historically, the borough has an annual housing delivery significantly less than 686 dwellings per annum.</p> <p>CPBC has undertaken a Strategic Land Availability and Urban Capacity Study (January 2023) and a borough wide Development Options and Technical Paper (July 2024). The latter identified land availability outside of Green Belt and undertook density modelling of sites seeking to maximise the most effective use of land for development in the borough.</p>		

CPBC have also prepared a Green Belt Assessment July 2025 as guided by the NPPF to identify potential Grey Belt sites for development. Identified sites were reviewed against further criteria: designated habitat and heritage sites; flood risk zones; transport constraints e.g. access issues or requirements for significant upgrades on highways impacting viability; and sustainability criteria. This work has been described in the Housing Capacity Topic paper (July 2025). CPBC also prepared the Strategic Land Availability Assessment July 2025 and Site Assessments for Canvey Island, Benfleet, Hadleigh, Thundersley and Daws Heath (July 2025). The approach to site assessments is further supported by the Sustainability Appraisal (July 2025).

CPBC has considered what housing delivery can be realistically achieved within its boundaries taking into account its significant environmental and infrastructure constraints as well as its market capacity. The evidence from the Green Belt Assessment, Strategic Land Availability Assessments, Housing Topic Paper and the recently finalised [Market Absorption Rates - Castle Point Housing Delivery Technical Note](#) has identified that CPBC has the capacity to deliver 6,196 homes through the planned period.

CPBC acknowledges that the Castle Point Plan proposes less housing than identified by the full Standard Method Housing Need but considers based on the evidence that this is a realistic housing requirement.

CPBC has contacted its neighbouring authorities including in January and February 2025 to assist with meeting the newly calculated housing need.. All responded with the view that at the time they could not offer any assistance in meeting CPBC's unmet housing needs.

Since the Regulation 19 consultation (August – September 2025), CPBC has led joint working through the South Essex Joint Officers Group to try to address their unmet housing need. Part of this work includes reviewing the EPOA Mechanism for Considering Unmet Housing Need (2017) to come to a shared joint position statement on the housing need within South Essex. The joint statement is proposed to be signed prior to submission.

Statements of Common Ground have been agreed with CPBC's neighbouring authorities (Rochford, Brentwood, Southend-on-Sea and Thurrock) to reflect the position. These will all be made available on the Council's [examination website](#) at the point of submission.

Ultimately, whether the proposed housing delivery and the evidence to support it is positively prepared, justified, effective and consistent with national policy will be decided at examination.

ECC and CPBC agree that the Castle Point Plan does not meet the Standard Methodology Housing Need requirement in full of 11,662 homes. Both parties agree that Castle Point faces notable physical constraints including the borough's size, population density, transport issues, environmental constraints with a substantial proportion of land designated as Green Belt and a significant proportion falling within Flood Risk Zone 3.

In accordance with NPPF, paragraph 147c, prior to submission of the Plan, CPBC has demonstrated through the Duty-to- co-operate and SoCGs with their neighbouring and nearby authorities that they have made appropriate efforts to engage on its unmet housing need.

CPBC and ECC agree that they have a strengthened biodiversity duty under the Environment Act 2021 to have regard to the Essex LNRS in preparing and implementing the plan. Both parties have agreed to replace references to 'Strategic Combined Opportunity Areas' from '*safeguarded*' or '*enable and support*' to '*protected and enhanced*' or '*protect and enhance*' in SP1 and other relevant policies in the plan. However, it remains unclear the weight applied to Strategic Combined Opportunity Areas for biodiversity in preparing the Plan given that Policy SP1 stated they '*...are safeguarded to deliver the additional nature benefits identified to create more connections between habitat areas*'.

ECC, and its consultants, are reviewing the Transport Assessment, against the issues highlighted in the Regulation 19 consultation response. Consequently, it remains unclear the weight and justification of "severe" impact of growth on the network that has been implemented to determine the deliverability of sites in the Green Belt.

ECC considers it is still unclear how circumstances have changed to previously allocated sites in the Green Belt, that are no longer considered suitable for development, as evidenced by the Green Belt assessment.

CPBC and ECC acknowledge that the soundness and legal compliance of the Castle Point Plan and its supporting evidence will be considered by an independent Inspector appointed to examine the Plan. CPBC and ECC will continue to work together to address outstanding matters as far as possible.

Appendix Item 14	Local Plan Reference	Summary of Representation
Rep No;	Strategic Policy SP3, Paragraph 6.57, Page 28	<p>There have been regular meetings between ECC and CPBC with regards the preparation of the Castle Point Plan and early drafts of the Plan have been shared with ECC.</p> <p>However, further evidence has been completed post the IDP May 2025 and needs to be incorporated into the IDP. Equally the IDP refers to three growth scenarios not the final housing strategy which is in the Reg 19 draft. EEC is of the view that that CPBC has not met its duty to cooperate.</p> <p>Evidence that needs to be incorporated into the Plan includes; ECC Developers' Guide to Infrastructure Contributions (November 2025), Castle Point LCWIP, Essex LCWIP July 2025 , Local Transport Plan July 2025 ECC did not see the , West Canvey Addendum (Aug 2025), South Essex Implementation Strategy (July 2025), SSHANA July 2025, Shared Standards in Water Efficiency June 2025. This evidence has implications on the IDP and ECC would need to do further assessment on the infrastructure impacts of the proposed housing strategy.</p>
<b>CPBC response</b>		
It is agreed that CPBC and ECC have held regular meetings during the preparation of the local plan including sharing earlier drafts of the Castle Point Plan.		
<p>Much of the work for the Reg 19 Draft of the Plan was completed in May/June 2025 in advance of the Plan being approved for consultation. However, it is accepted that since May 2025 further additional evidence has been published. Following feedback from the Reg 19 Consultation CPBC is updating some of its evidence base including the Transport Assessment and Infrastructure Delivery Plan. The latest evidence and feedback will also inform the modifications to the final draft of the Local Plan.</p>		
<p>In January 2026, ECC completed the additional cumulative assessment of primary, secondary, SEND and early years education and childcare based on a new scenario provided by CPBC. The requirements are set out in three reports which have been incorporated into the Schedule of Modifications, Appendix 1 and the IDP update, which will be submitted alongside the Plan.</p>		
CPBC have provided ECC with the updated Transport Assessment and the updated Infrastructure Delivery Plan will be made available for review once completed.		
It is agreed that CPBC and ECC have had regular meetings and ECC have received the updated Transport Assessment, West Canvey Infrastructure Delivery Plan and information to complete a cumulative assessment for education provision.		
<p>ECC has completed a cumulative assessment of primary, secondary, early years education and childcare, and SEND based on the proposed growth in the Castle Point Plan following the Regulation 19 consultation. Following duty to co-operate discussions, a further assessment has been completed to reflect the full 2,700 homes set out in Policy C4 – West Canvey rather than the 2,000 homes in the plan period, as previously required by CPBC. The outputs have been incorporated into the Schedule of Modifications, Appendix 1 and the IDP update . ECC has provided comments on the West Canvey IDP.</p>		

EEC is reviewing the updated Transport Assessment following the comments submitted as part of the Regulation 19 consultation. If the updated TA is supported by ECC its recommendations will need to be incorporated into the relevant plan policies and any updates to the IDP, where necessary.

ECC highlighted that the published IDP (May 2025) was not based on the infrastructure requirements to deliver either the Government's full standard methodology housing requirements or the homes set out in Policy SP3 (6,196 homes) but three growth scenarios ranging between 4,862 to 8,845 homes, including some development in the Green Belt. The IDP should reflect the infrastructure required to deliver the level and distribution of growth set out in the submission plan.

CPBC are preparing an update to the IDP which will be one consolidated report (including relevant sections of the May 2025 and West Canvey Addendum October 2025).

The IDP update will be required to consider the significant amount of new and/or updated evidence that has been published and/or completed since that which informed the IDP May 2025. Some examples are set out in the ECC Regulation 19 response and include the Transport assessment and further education assessment. The final IDP will be made available to ECC to review.

Some updated evidence has been incorporated into agreed modifications set out in Appendix 1 including the use of the ECC Developers' guide to infrastructure contributions (November 2025), draft Local Transport Plan July 2025 and South Essex Implementation Strategy (July 2025) consultation documents, the SSHANA July 2025 and December Update, and the Shared Standards in Water Efficiency June 2025. Other evidence will have implications on the IDP and ECC would need to do further assessment on the infrastructure impacts of the proposed housing strategy.

CPBC and ECC acknowledge that the soundness and legal compliance of the Castle Point Plan and its supporting evidence, including the IDP, will be considered by an independent Inspector appointed to examine the Plan and will continue to work together to address outstanding matters as far as possible.

Appendix 147	Local Plan Reference	Summary of Representation
Rep No:	Infrastructure Delivery Plan, May 2025	<p>ECC has input to the IDP Baseline Review (2024) and the IDP, May 2025 with regards ECC's roles and responsibilities.</p> <p>The published IDP (May 2025) was not based on the infrastructure requirements to deliver either Government's standard methodology housing requirements or the homes set out in Policy SP3 but three growth scenarios ranging between 4,862 to 8,845 homes, including some development in the Green Belt.</p> <p>Prior to submission of the Plan, the IDP will require a significant update to:</p> <ul style="list-style-type: none"> <li>• fully reflect the evidence base referenced in the Plan, as a significant amount has been undertaken since the latest IDP.</li> <li>• ECC will need to undertake a cumulative assessment of the growth for education and early years and childcare</li> <li>• ECC was not provided with the opportunity to comprehensively review the completed TA (including its Appendices) and the West Canvey Addendum (August 2025) prior to public consultation (Reg 19 stage). ECC as the local Highways Authority provided a high level review to inform the ECC response. Any revised assessment will need to inform the next iteration of the IDP.</li> <li>• The revised IDP will need to inform a review of the Whole Plan Viability Assessment.</li> </ul>
CPBC response		
<p>CPBC provided ECC with the updated data of a single growth scenario for the cumulative assessment of primary, secondary, early years education and childcare, post 16 and SEND. ECC provided reports to CPBC to inform site policies and an updated IDP.</p> <p>A revised Transport Assessment has been prepared by SYSTRA including a review and response to the concerns raised by ECC in the Reg 19 response. This is being reviewed by ECC and if supported, will be incorporated into the relevant Plan policies and the IDP where necessary.</p> <p>The final IDP will be made available to ECC to review.</p>		
<p>ECC has completed a cumulative assessment of primary, secondary, early years education and childcare, and SEND based on the proposed growth in the Castle Point Plan following the Regulation 19 consultation in November 2025. Following duty to co-operate discussions, a further assessment has been completed in January 2026 to reflect the full 2,700 homes set out in Policy C4 – West Canvey rather than the 2,000 homes in the plan period, as previously</p>		

required by CPBC. The outputs have been incorporated into the Schedule of Modifications, Appendix 1 and IDP update . ECC has provided comments on a draft update to the West Canvey IDP.

EEC is reviewing the updated Transport Assessment, following the comments submitted as part of the Regulation 19 consultation. If the updated TA is supported by ECC its recommendations will need to be incorporated into the relevant plan policies and any updates to the IDP, where necessary.

ECC highlighted that the published IDP (May 2025) was not based on the infrastructure requirements to deliver either the Government's full standard methodology housing requirements or the homes set out in Policy SP3 (6,196 homes) but three growth scenarios ranging between 4,862 to 8,845 homes, including some development in the Green Belt. The IDP should reflect the infrastructure required to deliver the level and distribution of growth set out in the submission plan.

CPBC are preparing an update to the IDP which will be one consolidated report (including relevant sections of the May 2025 and West Canvey Addendum October 2025) and address any outstanding issues including new and/or updated evidence that has been published and/or completed since that which informed the IDP May 2025. Some examples are set out in the ECC Regulation 19 response and include the Transport Assessment and further education assessment. The final IDP will be made available to ECC to review.

CPBC and ECC acknowledge that the soundness and legal compliance of the Castle Point Plan and its supporting evidence, including the IDP and Transport Assessment, will be considered by an independent Inspector appointed to examine the Plan and will continue to work together to address outstanding matters as far as possible.



Appendix 150	Local Plan Reference	Summary of Representation
	Level 2 Strategic Flood Risk Assessments	Require the upper end climate change allowance of 45% for peak rainfall intensity to be used within the Level 2 SFRA.
CPBC response		
<p>During the development of the SFRA Methodology, this was agreed with the Environment Agency and included a climate change allowance of 40%. Although the methodology was shared with ECC in their role as Lead Local Flood Authority (LLFA), they were unable to provide comments on the methodology at that time. As a result, the SFRA has been prepared based on the 40% allowance.</p>		
<p>Following comments raised during the Regulation 19 Consultation, an update to the Level 1 and Level 2 SFRA has been prepared. Alongside this, an addendum has also been prepared for the Level 2 SFRA which provides further site specific assessments for the broad locations identified in the Castle Point Plan. During the update of these documents, ECC have had the opportunity to review and provide feedback. This has been incorporated into the finalised versions which will be published on the Council's website at the point of submission.</p>		
<p>Due to the more complex nature of updating the climate change allowance from 40 to 45%, as required by the Environment Agency advice on <a href="#">Climate Change Allowances</a>, and supported by ECC, this work is currently ongoing. All other issues raised by ECC regarding the SFRA, have been resolved through the updates and addendum to the SFRA.</p>		
<p>CPBC and ECC acknowledge that the soundness and legal compliance of the Castle Point Plan and its supporting evidence, including the SFRA, will be considered by an independent Inspector appointed to examine the Plan and will continue to work together to address outstanding matters as far as possible.</p>		

Appendix No: 75 and 138	Local Plan Reference	Summary of Representation
Rep No;	(75) Paragraph 17.9, Page 128 and Policies Map	<p>ECC considers that the schools identified below should not be considered as an “exceptional circumstance” to development in Green Belt to allow them to expand to meet pupil demand if required and be removed from the Green Belt. This approach was recommended by the Inspector in para 43 of his report to the withdrawn Castle Point Local Plan 2022 and is highlighted and supported in the Green Belt Assessment, paragraph 3.3.5 supporting this Plan.</p> <p>ECC request these school sites are also identified for educational use on the policies map to provide more weight to Policy Infra2.</p> <ul style="list-style-type: none"> <li>• King John School, Benfleet;</li> <li>• The Deanes School, Benfleet;</li> <li>• Glenwood School, Benfleet;</li> <li>• Kents Hill Infants and Junior School, Benfleet;</li> <li>• Holy Family Catholic Primary School, Benfleet;</li> <li>• Robert Drake Primary School, Benfleet;</li> <li>• Canvey Skills Campus / Procat, Canvey Island; and</li> <li>• Cornelius Vermuyden, Canvey Island.</li> </ul>
<p>CPBC does not accept the removal of these sites from Green Belt designation. The Castle Point Plan is a new plan and has been prepared in different circumstances to the previous withdrawn plan. The new plan proposes a new housing strategy of urban intensification consequently the Green Belt becomes more significant as the Green Belt tightly bounds the existing urban areas and there is limited green space in Castle Point. As all these sites are within designated Green Belt, the Council considers that further development of these sites is not acceptable.</p>		
<p>CPBC and ECC do not agree on whether the schools identified should be removed from the Green Belt.</p> <p>CPBC and ECC acknowledge that the soundness and legal compliance of the Castle Point Plan and its supporting evidence will be considered by an independent Inspector appointed to examine the Plan. It is considered that this matter will need to be considered by the appointed planning Inspector in due course.</p>		



CPBC has worked collaboratively with ECC to address strategic and cross boundary matters that, in addition to those above, arise through the plan review process. This will occur on an ongoing basis through regular DtC meetings. A Ministerial Statement by the Minister of State for Housing and Planning on 27 November 2025 indicated a firm intention to remove the Duty to Cooperate for plans in the current system, subject to new Regulations being laid and coming into force. The Regulations have not yet been laid, therefore the Duty to Cooperate still applies to the CPBC Castle Point Plan (Local Plan) currently under preparation until the Regulations come into force, at which point the Duty to Cooperate will be abolished and new policies will come into place regarding collaborating across boundaries. The Statement says that Local planning authorities

should continue to collaborate across their boundaries, including on unmet development needs from neighbouring areas and Planning Inspectors will be required to continue to examine plans in line with the policies in the NPPF on ‘maintaining effective co-operation’.

There is ongoing work between CPBC and ECC in relation to the Transport Assessment, Infrastructure Delivery Plan, Education Cumulative Assessment and the Strategic Flood Risk Assessment, as set out in this statement. CPBC and ECC will continue to work together to address these outstanding matters as far as possible.

ECC was consulted on the Castle Point Plan at all stages of its preparation, and their comments were considered alongside strategic matters. Further meetings will be organised where appropriate or requested.

## 6. Signatories

<p>Castle Point Borough Council Amanda Parrott <b>Assistant Director, Climate and Growth</b></p> <p>Signature:</p>  <p>Date: 2 February 2026</p>	<p>Essex County Council Graham Thomas <b>Head of Planning and Sustainable Development</b></p> <p>Signature:</p>  <p>Date: 2 February 2026</p>
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## Appendix 1 - List of ECC representations, CPBC comments and modifications

## Appendix 2 – Map of Castle Point Borough Council’s administrative area in context with its neighbouring districts and county councils.

## Appendix 1

### Essex County Council Response to Regulation 19 Draft of The Castle Point Plan

Policy	ECC Response	Summary	CPBC officer response	Modification
(1) Chapter 2 Policy Content. Paragraph 2.5-2.6 Page 9	<p>ECC welcomes recognition of its minerals and waste planning function in Essex and the relationship between the Plan, the Essex Minerals Local Plan (MLP) (2014) and the Essex and Southend-on Sea Waste Local plan (WLP) (2017), which together comprise the statutory Development Plan for the borough. However, ECC seek this is further clarified and further detail clarification provided with regards the function of Mineral Safeguarding Areas and Mineral and Waste Consultation Areas including the potential requirement for a Mineral or Waste Infrastructure Impact Assessment (MIIA or WIIA).</p> <p>Proposed text amendment  <i>Essex County Council is the Minerals Planning Authority for Castle Point Borough and is responsible for preparing planning policies and assessing applications for mineral development. The Essex Minerals Local Plan (MLP) (2014) forms part of the statutory Development Plan and should be read alongside the Castle Point Plan. The role of the MLP is to ensure a steady and adequate supply of mineral resources to facilitate development over the Local Plan period and beyond and is currently being reviewed. Essex County Council must be consulted on all non-mineral related development proposed within a Minerals Safeguarding Area (MSA) that meet thresholds defined in the MLP. A Mineral Resource Assessment may need to be undertaken in advance of development. The MLP designates Mineral Consultation Areas (MCAs) at a</i></p>	Supports recognition of Minerals and Waste Planning Function in Essex. Further clarification and detail required in the supporting text regarding the function of Mineral Safeguarding areas and Mineral and Waste Consultation Areas and the potential requirement for a Mineral or Waste Infrastructure Impact Assessments	Accepted Additional clarification but shortened text added as requested to provide clarity.	<p><u>Essex County Council is the Minerals Planning Authority for Castle Point Borough and is responsible for the preparation of the Minerals Local Plan 2014 (MLP), which is currently being reviewed. The MLP forms part of the Statutory Development Plan for the borough and should be read alongside the Castle Point Plan.</u></p> <p><u>Essex County Council must be consulted on all non-mineral related development proposed within a Minerals Safeguarding Area (MSA) that meet thresholds defined in the MLP. A Mineral Resource Assessment may need to be undertaken in advance of development. The MLP designates Mineral</u></p>

Policy	ECC Response	Summary	CPBC officer response	Modification
	<p><i>distance of 250m around active quarries, other mineral infrastructure and mineral deposits permitted for or allocated for extraction. A Mineral Infrastructure Impact Assessment may need to be undertaken.</i></p> <p><i>Essex County Council is also the Waste Planning Authority for Castle Point Borough Council and is responsible for preparing planning policies, and also for assessing applications for waste management development. The Essex and Southend-on-Sea Waste Local Plan (WLP) was adopted in July 2017 forming part of the statutory Development Plan and should be read alongside the Plan. The WLP covers the period from 2017 to 2032. It sets out where and how waste management developments can occur, and contains the policies against which waste management planning applications are assessed. The Waste Local Plan (WLP) designates Waste Consultation Areas (WCAs) at a distance of 250m around permitted and allocated waste management facilities or within 400m of a Water Recycling Centres. ECC must be consulted on all non-waste related development within these areas to ensure that the proposed development would not adversely impact on their existing or future operation. A Waste Infrastructure Impact Assessment may need to be undertaken.</i></p> <p><i>The Policies Map identifies Mineral Safeguarding Areas within the Plan area.</i></p>			<p>Consultation Areas (MCAs) at a distance of 250m around active quarries, mineral infrastructure and deposits and any development within these areas will require a Mineral Infrastructure Impact Assessment. Essex County Council is the Waste Planning Authority for Castle Point Borough, and the Essex and Southend-on-Sea Waste Local Plan (WLP) July 2017 forms part of the Statutory Development Plan for the borough and should be read alongside the Castle Point Plan. The WLP designates Waste Consultation Areas (WCAs) at a distance of 250m around permitted and allocated waste management facilities or within 400m of a Water Recycling Centre. A Waste Infrastructure Impact Assessment will be required for any development within</p>

Policy	ECC Response	Summary	CPBC officer response	Modification
				these thresholds to ensure there is no adverse impact on their existing or future operation.
(2) Vision & Objectives, Paragraph 5.2, Page 18, Objective 18	<p>3. Effective</p> <p>ECC welcomes the inclusion of Objective 18, which refers to “<i>well-designed homes that meet local needs in terms of quantity, affordability and any accessibility requirements.</i>” This aligns with ECC’s strategic priorities around inclusive housing and accessibility.</p> <p>However, the Vision and Objectives do not explicitly acknowledge the borough’s ageing population or the need for affordable specialist accommodation. This issue was identified in ECC’s Regulation 18 response to Question 1 of that consultation and the suggested amendments enable this to be satisfied.</p> <p>The Essex Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025) provides updated evidence of future housing need in Castle Point, including:</p> <ul style="list-style-type: none"> <li>• 1,056 retirement/sheltered housing units</li> <li>• Approx. 710 market units</li> <li>• Approx. 346 affordable/social rent units</li> <li>• 594 extra care housing units</li> <li>• Approx. 385 market units</li> <li>• Approx. 209 affordable/social rent units</li> <li>• 139 nursing care beds</li> <li>• 138 residential care beds</li> <li>• 158 wheelchair-accessible homes (M4(3))</li> <li>• 15 residential placements for Children in Care</li> </ul>	<p>The newly Specialist Housing and Accommodation Needs Assessment (SSHANA, July 2025) has been published and provides evidence on future specialist and supported housing needs in Castle Point. The vision and objectives need to reflect new evidence.</p>	<p>Accepted: Additional text included into the Vision and Objectives to acknowledge the need for affordable specialist accommodation based on the evidence from the SSHANA July 2025.</p>	<p>Replace with following text “<i>Provide well designed homes that meet local needs in terms of quantity, affordability, <u>care</u>, <u>support and accessibility</u> and any accessibility requirements.</i>”</p>

Policy	ECC Response	Summary	CPBC officer response	Modification
	<p>It also provides evidence for supported housing units for people with learning disabilities, autism, physical/sensory impairments, mental health needs, and lower-level support needs.</p> <p>The figures set out above should be treated as estimated need rather than delivery targets. While the SSHANA was finalised after the publication of this consultation its draft outputs should be considered for inclusion in the Submission Plan. It provides proportionate evidence to support the refinement of strategic objectives.</p> <p>ECC considers that the current Vision does not reflect these needs, nor reference accommodation requirements for children in care, care leavers, or adults with complex needs. The amendment to Objective 18 will enable the concerns made at Regulation 18 to be satisfied and are supported by evidence in the Local Housing Needs Assessment (2023) and the Essex Supported and Specialist Housing and Accommodation Needs Assessment (2025); align with ECC's statutory duties under the Care Act 2014 and Children Act 1989; and are consistent with NPPF paragraph 63 addressing the housing needs of different groups in the community.</p>			
(3) Vision & Objectives, Paragraph 5.2, Page 18, Objective 19.	<p>The Essex Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025) provides updated evidence of future housing need in Castle Point. It also provides evidence for supported housing units for people with learning disabilities, autism, physical/sensory impairments, mental health needs, and lower-level support needs.</p> <p>The Vision and Objectives do not explicitly acknowledge the borough's need for affordable specialist accommodation. This issue was identified in ECC's Regulation 18 response to Question 1 of that consultation and the suggested amendments enable this to be satisfied.</p>	For the Vision and Objectives to incorporate findings from the recently published evidence from The Specialist Housing and Accommodation Needs Assessment (SSHANA, July 2025).	Accepted: The Vision and Objectives updated to include evidence from the SSHANA July 2025 to address the needs of an aging population within this objective	Replace with the following text " <i>Secure improved health and wellbeing outcomes for residents enabling more active and healthier lifestyles, creating healthy Living environments and reducing health inequalities ensuring inclusive communities</i> "

Policy	ECC Response	Summary	CPBC officer response	Modification
	The amendment to Objective 19 will enable the concerns made at Regulation 18 to be satisfied and are supported by evidence in the Local Housing Needs Assessment (2023) and the Essex Supported and Specialist Housing and Accommodation Needs Assessment (2025); align with ECC's statutory duties under the Care Act 2014 and Children Act 1989; and are consistent with NPPF paragraph 63 addressing the housing needs of different groups in the community.			
(4) Vision & Objectives, Paragraph 5.2, Page 18, Objective 2	<p>ECC welcomes the inclusion of Green and Blue Infrastructure (GBI) within the vision and environmental objectives of the Plan. Recognition of key strategic frameworks including the Essex Local Nature Recovery Strategy (ELNRS), the South Essex GBI Strategy, and SEE Park is supported. Their integration demonstrates a positive commitment to enhancing ecological networks and supporting nature recovery at both local and regional scales.</p> <p>ECC particularly support the Plan's ambition to protect existing green spaces and increase the provision of high-quality, multi-functional GBI. This approach not only contributes to biodiversity and climate resilience but also promotes healthier lifestyles through improved connectivity and active travel opportunities. Strengthening these networks will be vital in delivering sustainable development and improving the wellbeing of communities across the borough.</p> <p>While GBI is captured within the environmental objectives and chapter, it is important in the delivery of the local plan to not silo GBI and that its function and benefits extends across multiple plan areas. For instance, GBI contributes significantly to placemaking, flood risk management, climate adaptation, health and wellbeing, education and</p>	Supports the GI objectives protecting green spaces and provision of high-quality, multifunctional GBI within the Vision and Objectives supported by key strategic frameworks of the ELNRS and the South Essex GBI strategy. Comments that GBI also has additional benefits of placemaking including enhanced connectivity via active and sustainable modes, flood risk management, health and wellbeing and climate adaptation.	Noted.	No Mods



Policy	ECC Response	Summary	CPBC officer response	Modification
	sustainable transport. A more integrated approach that highlights these cross-cutting benefits throughout the Plan will help ensure GBI is fully embedded in decision-making and delivery.			
(5) Strategic Policy SP1, Criteria 1, Page 19	<p>ECC support the delivery of the ELNRS, providing protection and enhancement to the Areas of Particular Importance for Biodiversity as identified in the ELNRS. The ELNRS helps to identify areas for habitat creation and enhancement; prioritise areas for action; support and promote nature recovery; and deliver coordinated action for biodiversity and climate resilience</p> <p>The ELNRS includes two key map types:</p> <ul style="list-style-type: none"> <li>• Areas of Particular Importance for Biodiversity (APIBs): Nationally and locally designated sites.</li> <li>• Opportunities Mapping: o Strategic Opportunities – Areas with potential for habitat creation (e.g. woodland, grassland, scrub, freshwater, coastal and marine).</li> <li>• Potential Opportunities – Urban and other areas where habitat creation could be beneficial.</li> </ul> <p>APIBs are not included within the opportunities mapping. Therefore, the Strategic Combined Opportunity Areas are <b>not statutory designations, so do not have the same weighting</b>, but they are <b>strategic priorities</b> for investment and coordinated action. The ELNRS encourages local authorities and partners to focus efforts in these areas to maximise impact. These areas are intended to deliver the greatest combined benefits for biodiversity, climate resilience, water management, and public wellbeing. They aim to connect fragmented habitats and support the Nature Recovery Network.</p>	<p>Supports policies to deliver the ELNRS through the local plan but queries the weight given to Strategic Combined Opportunity Areas within the local plan. Considers that the word “safeguarding” implies that Strategic Combined Opportunity Areas have the same weighting as statutory designations, including the APIBs. ECC request replacing the word “safeguard” with “enable and support”.</p>	<p>Not Accepted. The Council has a legal duty to have regard to the relevant Local Nature Recovery strategy for their area within their local plans. Paragraph 192 (a) of the NPPF states that <i>plans should identify, map and safeguard areas identified by national and local partnerships for habitat management, enhancement, restoration or creation...</i> it then goes on to say that (Local Planning Authorities) “<i>should consider what safeguarding would be appropriate to enable the proposed actions to be delivered, noting the potential to target stronger safeguarding in areas the local planning authority considers to be of greater importance.</i>” This position is further supported by Section 40 &amp; 41 of the NERC Act 2006.</p>	<p>Proposed text amendment to criteria 1 Ensuring those areas identified as Strategic Combined Opportunity Areas are <u>safeguarded protected and enhanced</u> to deliver the additional nature benefits identified to create new connections between habitat areas;</p> <p>“<u>protect and enhance</u>” should replace ‘enable and support’ in policies C1, C4, C6, C8 &amp; C9 etc. South Benfleet (B1, B4, B7, B8 and B9); Hadleigh (Had1, Had2, Had3); Thundersley (Thun2); Daws Heath (DH1); Policy E1- Development on Strategic Employment Land; Policy ENV2 – Coastal and Riverside Strategy; and Policy ENV4 - Local Wildlife and Geological Sites.</p>

Policy	ECC Response	Summary	CPBC officer response	Modification
	<p>Whilst the ambition to ‘safeguard’ Strategic Combined Opportunity Areas is welcomed, the formal weighting of the ELNRS within the planning system is still to be defined, pending further government guidance. However, ELNRSs do provide a statutory framework, requiring public authorities to have regard to them in decision-making, as set out in Planning Practice Guidance (PPG). They offer a clear, evidence-based understanding of local opportunities for nature recovery, which can inform planning policies and decisions.</p> <p>To avoid weakening policy wording while awaiting clarity on the ELNRS’s formal status, ECC seek the term ‘safeguarded’ is removed from the policy and replaced with the phrase ‘...development proposals are designed to enable and support the habitat priority measures identified within Strategic Combined Opportunity Areas’. This would provide consistency with other policies in the Plan, regarding Canvey (Policy C1, C4, C6, C8 and C9); South Benfleet (B1, B4, B7, B8 and B9); Hadleigh (Had1, Had2, Had3); Thundersley (Thun2); Daws Heath (DH1); Policy E1- Development on Strategic Employment Land; Policy ENV2 – Coastal and Riverside Strategy; and Policy ENV4 - Local Wildlife and Geological Sites.</p>		<p>Essex LNRS map identifies that large areas of Castle Point are areas of particular importance to Biodiversity (APIB), particularly around Canvey Island. Further inland there are various isolated APIBs which are Local Wildlife sites and Ancient Woodland. The strategic combined opportunity areas connect these APIBs to form nature corridors through habitat creation</p> <p>The Essex Biodiversity Net Gain Evidence for Need Aug 2024<sup>1</sup> refers to the difficulties that isolated designated sites have in surviving with many being in poor condition. These include the decline of woodland and woodland birds in Essex and the loss of Local Wildlife sites (LoWS), the study cites one large LoWS in Castle Point which was lost to residential development in 2022.It concludes that strategic opportunity areas</p>	

<sup>1</sup> [Essex Biodiversity Net Gain Evidence for need](#)

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			<p>will provide the most benefits for nature recovery over onsite biodiversity improvements (those within the red boundary), where quality would be compromised.</p> <p>Castle Point is a small borough of approximate 17 square miles with a population density of circa 5000 per square mile, consequently its biodiversity uplift opportunities are more limited than other local authority areas.</p> <p>In response to the current guidance already referred to CPBC considers that the connections provided by the Strategic Opportunity Areas are important for isolated APIBs to survive and should therefore be “safeguarded” in order for the Council to meet its biodiversity duty in demonstrating improvements within the Borough.</p>	

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			The policies Canvey (Policy C1, C4, C6, C8 and C9); South Benfleet (B1, B4, B7, B8 and B9); Hadleigh (Had1, Had2, Had3); Thundersley (Thun2); Daws Heath (DH1); Policy E1- Development on Strategic Employment Land; Policy ENV2 – Coastal and Riverside Strategy; and Policy ENV4 - Local Wildlife and Geological Sites will be amended to be consistent with SP1 Criteria 1	
<b>(6)</b> Strategic Policy SP1, Criteria 2, Page 18	ECC support the focus of the policy on identifying new opportunities within and adjacent to existing urban areas to deliver multi-functional green infrastructure that enhances nature, habitat resilience, and climate resilience. However, ECC seeks the wording includes reference to 'urban greening', as this will help ensure that nature recovery and climate resilience are embedded across all parts of the borough, not just in peripheral or undeveloped areas.	Supports this policy criteria but recommends referencing "urban greening" to ensure nature recovery and climate resilience is embedded in urban areas as well as undeveloped areas.	Accepted: The Council considers that finding opportunities for biodiversity improvements within Castle Points Urban Areas is important for nature recovery, climate resilience and community wellbeing.	Amend text to: <i>Identifying new <u>urban greening</u> opportunities within and adjacent to the existing urban areas to deliver multi-functional green infrastructure that provides nature-based enhancements, habitat resilience and climate resilience.</i>
<b>(7)</b>	ECC support reference to the Essex Green Infrastructure Strategy and GI Standards in paragraph 6.5 as evidence of	Supports the reference to Essex Green Infrastructure Strategy and	Accepted: The Council agrees that the ELNRS is	Amend text to: <i>It also has a key role to play in</i>

Policy	ECC Response	Summary	CPBC officer response	Modification
Paragraph 6.5, Page 20	South Essex's environmental quality. However, the ELNRS also provides robust, evidence-based support for this and should be referenced here, as well as in paragraph 6.10. The ELNRS identifies priority areas and opportunities for nature recovery, making it highly relevant to the overall environmental context of the plan.	GI standards. Points out that the ELNRS identifies priority areas as well.	an important document in identifying opportunities for improving the natural environment and works in tandem with the Essex Green Infrastructure Strategy and GI Standards	<i>the overall quality of the environment in South Essex as evidenced by the <u>Essex Local Nature Recovery Strategy</u>, <u>South Essex Green and Blue Infrastructure Strategy</u>, <u>Essex Green Infrastructure Strategy</u> and <u>Green Infrastructure Standards</u> and the associated proposals for the SEE Park.</i>
(8) Paragraph 6.9, Page 20	Amend typo in paragraph 6.9	Typo missing "t" on requirement	Noted and Corrected:	Typo missing "t" on requirement
(9) Paragraph 6.10, Page 20	The ELNRS should not be seen as the sole mechanism for meeting the biodiversity duty under the NERC Act 2006. While the ELNRS is a significant and statutory consideration, it is one of several tools that support this duty. Fulfilling the biodiversity duty requires a broader approach that includes integrating biodiversity across planning, land management, and decision-making. Therefore, while the ELNRS is a valuable resource, it should be seen as part of a wider suite of strategies and actions that contribute to meeting the biodiversity duty.	The ELNRS is one tool of a number which contribute to the biodiversity duty	Noted. The Council agrees that there are a number of tools which contribute to meeting the biodiversity duty, the ELNRS is the most significant one.	No Mods
(10) Paragraphs 6.15 and 6.16, Page 20	We welcome the recognition of the Green Belt wider benefits beyond preventing urban sprawl, particularly in supporting nature conservation and the delivery of green and blue infrastructure. This broader view aligns with the	Supports the view that Green Belt has wider benefits from preventing urban sprawl, it also supports nature conservation and	Noted: The Council agrees that the Green Belt provides for wider benefits	No Mods

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	<p>NPPF (2024), paragraphs 156(C) and 159, which highlights the importance of enhancing green spaces to improve landscape character, support nature recovery, and meet local or Natural England standards for Accessible Green Space and Urban Greening Factor provision.</p> <p>To support this approach, the study “<i>A Greener Green Belt? Co-developing Exploratory Scenarios for Contentious Peri-Urban Landscapes</i>” by Kirby, Scott, and Walsh may be of interest. It explores future scenarios for England’s Green Belts, including a shift toward multifunctional landscapes that balance development pressures with climate resilience, biodiversity, and public wellbeing. The study highlights a growing consensus around the need for Green Belts to evolve into strategic urban support landscapes that deliver multiple environmental and social benefits.  <a href="https://researchportal.northumbria.ac.uk/en/publications/a-greener-green-belt-co-developing-exploratory-scenarios-for-cont">https://researchportal.northumbria.ac.uk/en/publications/a-greener-green-belt-co-developing-exploratory-scenarios-for-cont</a></p>	delivery of green and blue infrastructure and references Kirby Scott and Walsh study Landscape and Urban Planning March 2025		
(11) Policy SP2, Criteria 3b, Page 22	ECC support the aim to deliver well-designed neighbourhoods that enhance the local environment and create attractive, liveable places. As part of this, there is a clear opportunity to incorporate urban greening, particularly through the use of tools like Natural England’s Urban Greening Factor (UGF) consistent with Policy ENV3 – Securing Nature Recovery and Biodiversity Net Gain, criteria d.3.	Recommends the addition of urban greening to be included to deliver well-designed neighbourhoods that enhance the local environment	Accepted: The Council agrees that urban greening provides opportunities for creating attractive neighbourhoods.	Add additional criteria d : d: <i>Support the delivery of well-designed neighbourhoods, which enhance the local environment, <u>enable urban greening, to create places where people want to live, work, and visit now and in the future;</u></i>

Policy	ECC Response	Summary	CPBC officer response	Modification
(12) Paragraph 6.28, Page 24	ECC support the requirement for a masterplan, approved by CPBC, to be in place prior to the submission of a planning application. Masterplans should encourage a landscape-led approach to design to ensure that GBI, biodiversity, and climate resilience, and the ELNRS are considered from the outset, shaping development around the natural environment rather than retrofitting it.	Supports the requirement for masterplans prior to submission of a planning application and recommends that they are landscape-led to ensure that GBI, biodiversity and climate resilience are considered at the outset.	Noted:	No Mods
(13) Policy SP3 – Meeting Development Needs, Page 25	<p>ECC does not consider the Castle Point Local Plan (CPLP) to be legally compliant due to its failure to meet its standard methodology housing need requirement as outlined in the NPPF and National Planning Practice Guidance (NPPG). Paragraph 62 of the NPPF states that “<i>to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance.</i>”</p> <p>The current target for CPBC is 686 homes per annum using the standard method set out in the NPPF 2024, and updated to May 2025, which equates to 11,662 homes over the Plan period to 2043. The Plan is seeking to provide 6,196 homes (53%) up to 2043 within the existing urban area only, which results in a significant unmet housing need of around 5,500 homes.</p> <p>Housing requirements have significantly increased across South Essex (around 28%) and there are notable physical and environmental constraints, including a substantial proportion of land designated as Green Belt, international/National and local environment constraints, highway and junction capacity pressures and a significant proportion falling within Flood Risk Zone 3.</p> <p>CPBC have held meetings under the duty to cooperate with its neighbours within the Strategic Housing Market Area,</p>	<p>Considers the Castle Point Plan does not meet the Standard Methodology Housing Need requirement outlined in NPPF, but notes that there are notable environmental constraints including Green Belt, International and National designations, flood risk and highway and junction capacity issues.</p> <p>Comments that Castle Point has had DtC meetings and made requests for its neighbouring authorities to assist with its unmet housing needs and no opportunities have come forward outside its boundaries to meet its unmet need. Recommends SoCG prepared.</p> <p>Notes that evidence has been put forward to support CPBC housing strategy but queries its robustness and transparency in light of the</p>	<p>CPBC has considered what housing delivery can be realistically achieved within its boundaries taking into account its significant environmental and infrastructure constraints as well as the capacity of the housing market to deliver the level of growth .</p> <p>The CPBC position is supported by evidence from the Green Belt Assessment, Strategic Land Availability Assessments and Housing Topic Paper. Sites were assessed according to various criteria including Green Belt role, flood risk, impact on designated environmental and heritage sites, regard to the Essex LNRS, site access, transport network capacity and viability implications.</p>	<p>No Mods</p> <p>CPBC and ECC acknowledge that the soundness and legal compliance of the Castle Point Plan and its supporting evidence will be considered by an independent Inspector appointed to examine the Plan.</p>

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	<p>neighbouring and nearby local planning authorities and requested whether those councils would be willing to take any unmet need (non-defined level of need). Early responses suggested not. Likewise, CPBC has received requests from adjoining and nearby authorities to meet their unmet need to which the Council has responded negatively given the constraints in the Borough.</p> <p>Implementing the Duty to co-operate and the preparation of Statements of Common Ground is the most constructive approach to progress the matter. It should be noted that the DtC does not extend as far as a duty to agree that the borough's unmet need can be accommodated</p> <p>In addition, ECC has some concerns regarding the robustness and transparency of the evidence to justify the significant shortfall of 5,500 homes. For example, the Green Belt Sites Assessment concludes that only a limited number of Green Belt sites may be suitable for further consideration, but none are allocated. It is unclear what 'weight' has been given to the assessment of these sites with regards:</p> <ul style="list-style-type: none"> <li>• how circumstances have substantially changed on several Green Belt sites which were allocated in the withdrawn Plan by CPBC and supported by the Inspector following examination, with regards their impact on highway capacity, opportunities to enhance active and sustainable travel measures, and issues regarding site access (namely partly via residential routes).</li> <li>• the inconsistent reference to the 'severe' impact of growth on the highway network – the TA refers to 'significant impact' and parts of the Plan refers to 'severe' with regards the general performance of the network and at specific locations. It is unclear what 'weight' has been given to the impact on the</li> </ul>	<p>short fall of housing. Queries the non-inclusion of any potential development sites assessed in the Green Belt assessment including those that were previously recommended for allocation in the 'withdrawn' Local Plan, the inconsistent weight given to 'significant' and 'severe' impact of growth on highway capacity in determining site deliverability in transport terms and the weight applied to Strategic Combined Opportunity Areas for biodiversity in site allocation criteria.</p>	<p>The Castle Point Plan is a new and different plan based on new evidence and is not comparable to the previously withdrawn plan of June 2022.</p> <p>CPBC realises that the Castle Point Plan delivers considerably less housing than the Standard Method Housing Need but considers based on the evidence that this is a realistic housing delivery.</p> <p>Unmet Housing Need has been considered through the SEC and directly with neighbouring authorities. Relevant Statements of Common Ground have been put in place</p> <p>Ultimately, the soundness and legal compliance of the Castle Point Plan and its evidence will be decided at examination.</p>	



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	<p>highway network in determining the deliverability of sites identified in the Green Belt Site Assessment. A number of recent appeals have been allowed despite junctions modelled as being operating at or close to capacity. The impact was not considered severe by Inspectors with respect to NPPF e.g. APP/F2360/W/22/3295498 for housing at Penwortham, Preston. CPBC will need to be satisfied that their approach to severity is defensible at examination.</p> <ul style="list-style-type: none"> <li>the weighting given to Strategic Combined Opportunity Areas (SCOA) identified in the ELNRS. This may have been influenced by the reference to their need to be '<i>safeguarded</i>' in Policy SP1 rather than '<i>enable and support</i>'. PPG refers to Planning Practice Guidance states in preparing local plans the LPA has a legal duty to '<i>have regard to</i>' the relevant strategy for their area.</li> </ul> <p>A key role of ECC is to maintain high quality infrastructure to support a growing economy and the delivery of new homes and communities. Achieving this requires ECC to ensure that development, planning and infrastructure delivery across the administrative county, is aligned. This is to ensure that the delivery of ECC's infrastructure and services are commensurate with the growth being planned. Such requirements cannot place an unaffordable cost burden on the public purse or require early intervention to retrofit or "make good".</p> <p>It is not clear that CPBC can demonstrate that it has satisfactorily consulted with its neighbours within the Strategic Housing Market Area, neighbouring and nearby local planning authorities to provide a clear position, based</p>			

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	<p>on the current unmet need position, on how the level of their unmet housing need will be met and the position of its neighbouring and nearby authorities.</p> <p>In accordance with NPPF, paragraph 147c, prior to submission of the Plan, CPBC must demonstrate through the Duty-to- co-operate and SoCG with their neighbouring and nearby authorities that they have made appropriate efforts to engage on its unmet housing need.</p>			
<b>(14)</b> Strategic Policy SP3, Paragraph 6.57, Page 28	<p>ECC has held regular meetings with CPBC with regards the preparation of the Plan in terms of general policy matters, the evidence base (including the Transport Assessment), early draft iterations of the Plan (including its policies) and the IDP. ECC provided formal responses to the Issues and Engagement and Issues and Options consultations. ECC has ensured that the Essex Planning Officers Association (EPOA) policies and evidence regarding net zero development have been included in the Plan, namely Policies SD4 and SD5, and further updates are provided as part of this consultation. ECC has ensured that the key messages from the EPOA Essex Parking Guidance, Local Transport Plan - A Better Connected Essex and water efficiency requirements have been incorporated into the Plan, although some amendments are still necessary.</p> <p>Whilst officer meetings have been held with ECC to discuss the emerging spatial strategy, its implications with regards infrastructure requirements and the preparation of the IDP Baseline and IDP, May 2025, ECC considers that CPBC has not fully met its legal compliance with respect to the Duty to Co-operate</p> <p>Significant evidence base referenced in the Plan has been completed post the preparation of the IDP, May 2025, including significant evidence base referenced in the Plan</p>	<p>There have been regular meetings between ECC and CPBC with regards the preparation of the Castle Point Plan and early drafts of the Plan have been shared with ECC.</p> <p>EPOA's net zero development and Essex Parking Guidance and Local Transport Plan have all been incorporated into the plan, although some amendments were still necessary.</p> <p>However, significant evidence has been completed post the preparation and publication of the IDP May 2025 and needs to be incorporated into an updated IDP. The IDP May 2025 is based upon three growth scenarios and not the final housing strategy and sites set out in the Reg 19 consultation Plan. As a result EEC considers</p>	<p>It is agreed that CPBC and EEC have held regular meetings during the preparation of the local plan including sharing drafts of the Castle Point Plan for review.</p> <p>It is agreed that there has been additional evidence published since the preparation and publication of the IDP May 2025. Following feedback from the Reg 19 Consultation CPBC is updating some of its evidence base including the Transport Assessment and Infrastructure delivery Plan. The latest evidence and feedback will inform the proposed modifications to be submitted alongside the Plan.</p>	<p>No Mods</p> <p>Following the further assessment modifications will be provided to support the Submission Plan, specific Site Policies and the updated IDP.</p>

Policy	ECC Response	Summary	CPBC officer response	Modification
	<p>has been completed post the preparation of the IDP (May 2025), including the updated ECC Developers' Guide to Infrastructure Contributions (September 2025); Castle Point LCWIP; Essex Wide LCWIP; Transport Assessment (July 2025) and West Canvey Addendum (August 2025); Local Transport Plan A Better Connected Essex Transport Strategy (July 2025) and South Essex Implementation Strategy (July 2025); Essex Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025); ELRNS (July 2025); and Shared Standards in Water Efficiency (June 2025).</p> <p>The published IDP (May 2025) is not based on the infrastructure requirements required to deliver either Government's standard methodology housing requirements or the CPBC 6,196 homes, as set out in Policy SP3 but three growth scenarios ranging between 4,862 to 8,845 homes, including some development in the Green Belt. Whilst the strategy remains 'urban focussed' the allocated sites informing the IDP, May 2025 and site allocations in the Plan differ in terms of scale and their distribution. The Sustainability Appraisal, paragraph 28, bullet 1 infers that the plan policy position and Scenario 1 in the IDP are similar. In fact, there are significant differences in that some sites have been removed from the Plan and some 16 sites have been subject to significant change, which will impact on any infrastructure requirements. For example, West Canvey has increased from 1,000 to 2,700 homes (of which 700 post 2043) and Canvey Town Centre has increased from 200 to 820 homes.</p> <p>To demonstrate the implications, ECC, as the lead authority for Education, has undertaken a 'high-level' assessment of the Plan's growth on primary education and early years and childcare places (see Appendix 4). The assessment identifies the following changes in requirements:</p>	<p>that CPBC has not met its duty to cooperate on this matter.</p> <p>Evidence that needs to be incorporated into the Plan and IDP includes; ECC Developers Guide to Infrastructure Contributions (Nov 2025), Castle Point LCWIP, Essex LCWIP July 2025 , Local Transport Plan July 2025 (including the South Essex Implementation Strategy (July 2025)), SSHANA July 2025 and the Shared Standards in Water Efficiency June 2025. ECC did not have the opportunity to review the West Canvey Addendum (Aug 2025) prior to the commencement of the Reg 19 consultation. This evidence has implications on the IDP May 2025 and ECC would need to do further assessment on the infrastructure impacts of the proposed housing strategy, as set out in the Reg 19 Plan.</p> <p>Prior to submission ECC will be required to undertake a cumulative assessment of the infrastructure needs based on the proposed housing strategy set out in the Reg 19 Plan, namely 6,196 homes, particularly around</p>	<p>Prior to submission ECC will be required to undertake a cumulative assessment of the infrastructure needs based on the proposed housing strategy set out in the Reg 19 Plan, namely 6,196 homes, particularly around primary, secondary and early years education and childcare and SEND , and the additional evidence.</p> <p>CPBC will provide ECC the updated Transport Assessment to review prior to submission of the Castle Point Plan for examination.</p> <p>The IDP will be updated to include all latest information and evidence for ECC review.</p>	

Policy	ECC Response	Summary	CPBC officer response	Modification
	<ul style="list-style-type: none"> <li>• Consultation Plan – identifies the need for two 56 place early years and childcare nurseries and primary provision (non-defined).</li> <li>• ECC assessment – identifies the need for at least a new 2FE primary school; three new 72 place nurseries, of which one should be co-located with the primary school; one stand-alone 56 place nursery and potentially two further stand-alone 30 place nurseries subject to land being made available by developers.</li> </ul> <p>Prior to submission, ECC will need to undertake a cumulative assessment of the growth consistent with Section 3.4 of the Essex County Council Local and Neighbourhood Planners' Guide to School Organisation and Place Planning (September 2025) for education and early years and childcare. The assessment must be consistent with the updated ECC Developer's Guide for Infrastructure Contributions (September 2025) and reflecting the updated DfE Scorecard (Q1 2025) costs for education provision per place. ECC needs to ensure that the delivery of ECC's infrastructure and services are commensurate with the growth being planned. Such requirements cannot place an unaffordable cost burden on the public purse or require early intervention to retrofit or "make good".</p> <p>CPBC and its consultants Systra have held regular meetings with ECC with regards the preparation of the transportation evidence base. The TA Scoping Report was reviewed by ECC and considered an appropriate piece of evidence to support the Regulation 18 Consultation (Issues and Options – July – September 2024). However, ECC was not provided with the opportunity to comprehensively review the completed TA (including its Appendices) and the West</p>	<p>primary, secondary and early years education and childcare and SEND , and the additional evidence.</p> <p>EEC reviewed the transport assessment scoping report prepared by the consultants Systra, but the completed TA and the West Canvey Addendum could only be reviewed as part of the consultation. ECC provided substantive comments on the TA and its Addendum as part of the consultation, which require to be addressed prior to submission and its impact on the Plan and supporting IDP</p>		

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	<p>Canvey Addendum (August 2025), with the latter published post commencement of the consultation. An update to the Transport Assessment (TA), Transport Assessment Addendum; and Green Belt Sites Assessment will be required to address the issues, observations and queries identified following the ECC review of these documents (see Appendix 5) and will subsequently inform an update to the IDP.</p> <p>ECC considers that CPBC has not fully met its legal compliance with respect to the Duty to Co-operate and the IDP given:</p> <ul style="list-style-type: none"> <li>• the IDP May 2025 is not based on the infrastructure requirements required to deliver 6,196 homes</li> <li>• scenarios between 4,862 to 8,845 homes;</li> <li>• significant evidence base referenced in the Plan has been completed post the preparation of the IDP, May 2025, including the Transport Assessment, and which ECC had not reviewed prior to the consultation;</li> <li>• Prior to submission, ECC will need to undertake a cumulative assessment of the growth consistent with Section 3.4 of the Essex County Council Local and Neighbourhood Planners' Guide to School Organisation and Place Planning (September 2025) for education and early years and childcare to inform, policy requirements; the IDP and Whole Plan Viability Assessment.</li> </ul> <p>Prior to submission, the IDP will need to be updated to reflect the significant new policy guidance and evidence base that has been undertaken since it was prepared early in 2025.</p>			

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(15) Strategic Policy SP3, Criteria 2, Title of Table , Page 25	3. Effective ECC recommend the title of the housing supply table in paragraph 2 should be amended to 2025 to be consistent with the residential land monitoring position set out in the Housing Topic Paper of 1 April 2025.	Requests an amendment to table title for consistency with monitoring position in Housing Topic Paper April 2025	Accepted amendment to table made.	Amend title of table <i>Housing Supply at April 2023 to Housing Supply at April 2025</i>
(16) Strategic Policy SP3, Additional Criteria, Page 25	3. Effective While the stepped housing trajectory in Policy SP3 is welcomed, consideration should be given to a trajectory for the provision of supported and specialist housing. Estimated need is set out in the SSHANA for the period up to 2029, 2034, 2039 and 2044. ECC recognises that delivery is often market-led, but the Plan could better demonstrate how it will support delivery over the plan period.  ECC recommend consideration is given to the phased delivery of supported and specialist housing as set out in the SSHANA.	Recommends that consideration should be given to the trajectory of supported and specialist housing within its housing strategy	Noted Housing trajectories to consider the provision of supported and specialist housing	No Modifications
(17) Strategic Policy SP4, Criteria 1, Page 29	Effective As worded, Criteria 1 implies that contributions will only be made if the site is linked to an infrastructure item listed in the IDP. The IDP is a 'living document' and will change over time as more information is known regarding particular site requirements. The purpose of the policy should be to ensure that all sites (including windfalls) make an appropriate contribution towards the necessary infrastructure consistent with the statutory tests in regulation 122 (as amended by the 2011 and 2019 Regulations), namely necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.	The Infrastructure Delivery Plan is a living document, and appropriate contributions are required if infrastructure needs relevant to any particular site have been identified. Further clarity is required to SP4 policy.	Accepted.	Criteria 1 is deleted <del>The Infrastructure Delivery Plan identifies the infrastructure required to meet the demands of new development.</del>

Policy	ECC Response	Summary	CPBC officer response	Modification
(18) Strategic Policy SP4, Criteria 2, Page 29	<p>ECC generally supports the policy as it has been adapted to suit local circumstances from the ECC modal policy on 'Infrastructure Delivery and Impact Mitigation', which has been included in other adopted Local Plans in Essex.</p> <p>For clarity, criteria 2 should make it clear that a development can be made acceptable in planning terms through direct provision and/or proportionate contributions rather than only contributions.</p> <p>This amendment would be consistent with Strategic Policy SP2, criteria 3a which states:</p> <ul style="list-style-type: none"> <li>• <i>Provide or make a proportionate financial contribution to the delivery of necessary infrastructure alongside growth;</i></li> </ul> <p>And Policy Infra2, criteria 2 which states:</p> <p><i>2. Where a development proposal, either individually or cumulatively, increases demand for education facilities beyond those available within the local area, development will be required to provide land for a new educational facility, expand or alter an existing facility and/or make a proportionate contribution to fund necessary improvements to education facilities.</i></p>	Supports this policy, but greater clarity in criteria requiring that developers make direct provision and/or proportionate contributions towards infrastructure needs.	Accepted and additional text added for clarity	<p>Delete text for Criteria 2 and replace with: <i>Where necessary, the Council will seek <u>developers to make direct provision or provide proportionate contributions towards the provision of infrastructure required to make a development proposal acceptable in planning terms, in accordance with the tests set out in the National Planning Policy Framework (NPPF) and the provisions of the Community Infrastructure Levy Regulations and having regard to the provisions of the Infrastructure Delivery Plan. Proposals for any development must demonstrate that the required infrastructure to support the development will be delivered in a timely, and where appropriate, phased manner.</u></i></p>



Policy	ECC Response	Summary	CPBC officer response	Modification
Chapter 7	No Comment			
(19) Policy C1 – Canvey Island Town Centre, Criteria 10, Page 33	<p>Effective</p> <p>ECC welcome the encouragement of opportunities for greening the town centre in criteria 10. However, the reasoned justification should be strengthened by demonstrating how this will be achieved. The greening of town centres can enhance public spaces, improve biodiversity, and support climate resilience through greening streets, creating attractive and welcoming town squares, and integrating multifunctional green infrastructure into new developments.</p> <p>The reasoned justification could refer to the Nature Towns and Cities accreditation launched in 2025 (<a href="https://naturetownsandcities.org.uk/">https://naturetownsandcities.org.uk/</a>). By 2035, the goal is for 5 million more people to have easy access to nature and green spaces, and for 1 million more children to grow and play in greener environments.</p> <p><a href="https://naturetownsandcities.org.uk/">https://naturetownsandcities.org.uk/</a>.</p>	<p>Supports policy. Suggests adding a reference to <a href="https://naturetownsandcities.org.uk/">https://naturetownsandcities.org.uk/</a> as this would further strengthen this policy by demonstrating how this could be achieved.</p>	<p>Accepted and put reference to <a href="https://naturetownsandcities.org.uk/">https://naturetownsandcities.org.uk/</a> in the justification at paragraph 8.13</p>	<p><i>Add sentence to 8.13. There will be a need for local access to open spaces as well as space for visitors. There is also an opportunity to provide landscaping, green space and nature improvements for the benefit of residents and wildlife useful guidance can be found in Home - Nature Towns &amp; Cities. Where there are opportunities to provide flexible...</i></p>
(20) Policy C1 – Canvey Island Town Centre, Criteria 11, Page 33	<p>3. Effective</p> <p>ECC welcome the encouragement of opportunities for greening the town centre in criteria 11. However, the reasoned justification should be strengthened by demonstrating how this will be achieved. The greening of town centres can enhance public spaces, improve biodiversity, and support climate resilience through greening streets, creating attractive and welcoming town squares, and integrating multifunctional green infrastructure into new developments.</p> <p>The reasoned justification could refer to the Nature Towns and Cities accreditation launched in 2025 (<a href="https://naturetownsandcities.org.uk/">https://naturetownsandcities.org.uk/</a>). By 2035, the goal is for 5 million more people to have easy access to nature and green spaces, and for 1 million more children to grow and</p>	<p>Supports policy suggests adding a reference to Nature Towns and Cities within the justification</p>	<p>Accepted and reference added</p>	<p>additional text added to 8.17 <u>Redevelopment of Canvey Town Centre also provides opportunities for landscaping and biodiversity improvements to this area to create attractive green spaces and planting for residents to enjoy</u></p>



Policy	ECC Response	Summary	CPBC officer response	Modification
	play in greener environments. <a href="https://naturetownsandcities.org.uk/">https://naturetownsandcities.org.uk/</a> .			
(21) Paragraph 8.14 Page 33	3. Effective Reference to providing access to high quality safe and convenient, walking and cycling networks to ensure access is provided for town centre residents to access the lake, coastal areas, and larger open spaces is supported. Reference to active travel routes and shuttle buses to employment sites both on Canvey Island and in neighbouring economic centres, as well as to travel links (Benfleet train station) would be supported if feasible, which would increase access to employment sites and off-Island learning provision.	Supports policy to provide access to high quality safe and convenient walking and cycling routes within Canvey Town Centre	Noted	No Mods
(22) Paragraph 8.20 Page 36	3. Effective ECC support reference to The Paddock as a community and cultural asset of Canvey Island. Reference could also be made to any opportunities for it to support skills development of the local community, where 43% of working age residents are low skilled compared to 31% for Essex (ONS 2021)	Supports reference to The Paddock as a community and cultural asset on Canvey Island. There are opportunities for it to support skills development in the community	Accepted CPBC agrees that the Paddocks can provide opportunities to support skills development in the community	Amend final sentence to 8.20 read: .... <i>The Paddocks site will be re-imagined as a lively community hub as part of a high quality mixed use development better connected to the town centre, <u>which could support skills development of the local community</u> .</i>
(23) Paragraph 8.22 Page 37	3. Effective ECC welcome reference to future business growth and increases in tourism activities. Reference to Thorney Bay Pavillion as an asset in terms increasing tourism and attracting future business growth.	Supports policy suggests to add reference to Thorney Bay as an asset for increasing tourism and business growth.	Accepted CPBC agrees that Thorney Bay Pavillion can be an asset for increasing tourism and supporting business growth.	Change paragraph to read: <i>There is scope within this area to increase tourism activities, <u>including access to Thorney Bay Pavillion, through some additional business growth in the</u></i>

Policy	ECC Response	Summary	CPBC officer response	Modification
				<i>leisure and food and drink offer, and through the utilisation of public spaces including the park, the bandstand, and the beach</i>
(24) Policy C3 - Canvey Port Facilities, Criteria e	ECC support Criteria “e” requiring any substantive redevelopment, a change of use or change of materials handled being made in accordance with the requirements of Policy ENV3 and SD1	Supports policy that redevelopment and change of use or materials should be made in accordance with policies ENV3 and SD1	Noted	No Mods
(25) Policy C4 - West Canvey, Criteria 8, Page 40	<p>Please refer to the response to Policy Infra2 – Education, Skills and Learning, paragraph 19.20 with regards the ‘soundness’ of the Plan in education and Policy T1 in transportation terms.</p> <p>With regards Policy C4- West Canvey, this was previously assessed in education terms for 1,000 homes as highlighted in the IDP, May 2025. ECC indicated that a new primary school may be required along with a 56 and 30 place nursery.</p> <p>The policy has increased to 2,700 homes (of which 700 are beyond 2043) with only a requirement for a new 56 place stand-alone early years and childcare nursery and additional primary school provision as required. No specific land is allocated for a new school (F1) use.</p> <p>However, the provision of 2,700 homes will require at least a new 2FE primary school with the provision of land and contributions towards three new 72 place nurseries, of which one should be co-located with the primary school (see Appendix 4).</p>	Education Needs were assessed based on a lower number of housing at West Canvey, as highlighted in the IDP May 2025. A further assessment using the latest housing strategy is required to assess the impact of growth at West Canvey on primary, secondary, early years education and childcare and SEND to account for the full proposed housing of 2,700 homes set out in the policy.	<p>Accepted. CPBC will work with ECC to undertake a further assessment to identify the necessary primary, secondary, early years education and childcare and SEND provision for 2,700 homes at West Canvey and this policy and the IDP will be updated according to the results of that assessment.</p> <p>In January 2026, ECC provided addendums to the education assessments previously undertaken in November 2025.</p>	<p>Delete criteria 8 and replace with:</p> <p><i>A new <del>72</del> 56 place stand-alone early years and childcare nursery (Use Class E(f)) on <u>0.22</u> <del>0.13</del> hectares of suitable land and two new 56 place stand-alone early years and childcare nurseries (Use Class E(f)) each on <u>0.18</u> hectares of suitable land allocated for education and childcare use and additional primary school provision as required</i></p>
(26) Policy C4 - West Canvey,	ECC support the requirement for a masterplan, approved by CPBC, to be in place prior to the submission of a planning application. Masterplans should encourage a landscape-led	Supports the requirement to provide masterplans prior to submission of planning	Accepted. GBI, biodiversity and climate change should be	Amend Criteria 10 to read: <i>Development proposals must be</i>

Policy	ECC Response	Summary	CPBC officer response	Modification
criteria 10 Page 40	<p>approach to design to ensure that GBI, biodiversity, and climate resilience, and the ELNRS are considered from the outset, shaping development around the natural environment rather than retrofitting it. ECC support the promotion of urban greening in criteria 3 and 9 and the delivery and connection to GI to the west of the site. ECC support reference in Criteria 10, to requirements for development design to support the habitat priority measures identified in the Strategic Combined Opportunity Areas but recommend an amendment to reflect the correct terminology</p> <p>Should reference also be made to protecting areas identified as Areas of Particular Importance for Biodiversity (APIBs) consistent with Policy SP1, if there are such sites at this location.</p>	<p>application. Proposes landscape led design approach to master planning with early on consideration of ELNRS. Supports promotion of urban greening within the policy. Suggests referencing the protection of APIBs to be consistent with Policy SP1.</p>	<p>considered at the outset of any development design.</p> <p>Additional reference to 'protect and enhance' Strategic Combined Opportunity Areas' consistent with proposed change to Policy SP1 and to 'protect' APIBs</p>	<p><i>designed to protect and enhance the habitat priority measures identified within the Strategic Combined Opportunity Areas <del>Opportunities</del> as well as protect Areas of Biodiversity Importance set out in the Essex Local Nature Recovery Strategy (ELNRS).</i></p>
(27) Policy C5- Improved Access to and around Canvey Island	<p>ECC welcome reference in Criteria 2 and paragraph 8.50 to ECC, as Highway and Transportation Authority, being required to be directly involved in the scoping and undertaking of any feasibility study regarding improved access to and around Canvey Island. ECC is currently consulting on a new Local Transport Plan - 'A Better Connected Essex'. The South Essex Implementation Plan Appendix A identifies ideas of projects at a snapshot in time but which have not been subject to feasibility or have any funding. Relevant scheme ideas include:</p> <ul style="list-style-type: none"> <li>• Canvey Access Improvement to enhance connectivity to and from the island by all modes of transport to improve sustainable access and ease traffic congestion. This would improve access to services, health and wellbeing, and access to employment.</li> </ul>	<p>EEC welcomes its proposed involvement in any future Canvey Island improved access feasibility study. Tthe emerging Local Transport Plan includes scheme ideas for improving access to Canvey Island, have not been subject to feasibility or have any funding.</p>	Noted	No Mods

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	<ul style="list-style-type: none"> <li>Improved links from Canvey to Thames Freeport to improve access between Canvey Island and Thames Freeport to connect people to jobs and address high levels of deprivation. This would improve access to services, health and wellbeing, and access to employment.</li> <li>Castle Point walking and cycling improvements (LCWIP) - Route Number 10 - Connects Canvey Town Centre to Benfleet Station utilising the bridge at Canvey Road, Somnes Avenue, Central Wall Road and Knightswick Road.</li> </ul>			
(28)Policy C8 – Residential Park Home Sites, Canvey Island, Paragraph 8.70, Page 48	<p>ECC welcomes reference in paragraph 8.70 that any redevelopment of these sites must capture any change in likely infrastructure demand, in particular the new demand on school places compared to the current typically older residents.</p> <p>Any new housing would be deemed 'windfall' development. Any cumulative assessment undertaken consistent with Section 3.4 of the Essex County Council Local and Neighbourhood Planners' Guide to School Organisation and Place Planning (February 2025) would not be able to consider the impact of this potential growth alongside the 675 homes arising from other windfall. Consequently, any cumulative assessment would help establish any headroom in existing schools once Plan growth has been accounted for.</p>	Any development at Residential Park Home Sites would require to be included in cumulative assessment for primary education and early years provision.	<p>Noted. CPBC will work with ECC to undertake a further cumulative assessment to identify the necessary primary, secondary, early years education and childcare and SEND requirements including any impact arising from re-development from the Residential Park Home Sites.</p> <p>In January 2026, ECC provided addendums to the education assessments previously undertaken in November 2025.</p>	No Mods

Policy	ECC Response	Summary	CPBC officer response	Modification
(29) Policy B1 – South Benfleet Town Centre, additional criteria, Page 55	ECC seek an additional criterion to make reference to greening the town centre and providing biodiversity net gain at street level and above consistent with Policy C1, criteria 10.	Require additional criteria to reference greening town centre and providing biodiversity net gain	Accepted and additional criteria added to policy	Add an additional criteria  <i>5. Opportunities for greening the town centre and providing biodiversity net gain at street level and above</i>
(30) Policy B2 – Tarpots Town Centre, additional criteria, Page 56	ECC seek an additional criterion to make reference to greening the town centre and providing biodiversity net gain at street level and above consistent with Policy C1, criteria 10.	Require additional criteria to reference greening town centre and providing biodiversity net gain	Accepted and additional criteria added to policy	Add an additional criteria  <i>5. Opportunities for greening the town centre and providing biodiversity net gain at street level and above</i>
(31) Paragraph 9:4, Page 53	ECC welcome reference to the topography as being a potential barrier to active travel use from Benfleet Station to the northeast such as Thundersley and Hadleigh, in particular with regards Route 12 in the LCWIP connecting from Benfleet Station to Hadleigh town centre, utilising the trails through Benfleet Down and Hadleigh Country Park.  This will need to be considered when considering how the Schedule of Interventions relate to specific development sites and/or clusters to feed into any future update to the IDP.	The Topography in Benfleet is a potential barrier to active travel use from Benfleet Station to the Northeast towards Thundersley and Hadleigh and would require further consideration to feed into how the Schedule of Interventions relate to specific development sites and/or clusters to feed into any future update to the IDP.	Noted	No Mods
(32) Paragraph 9.9, Page 54	Paragraph 9.9 refers to the transport modelling for the Plan indicating a number of listed transport improvements in Benfleet. Further work will be required to ascertain how	Transport improvements in Benfleet will require further assessment to ascertain how they	Accepted. Further work would be required through the planning process.	Add additional bullet point to paragraph 9.9

Policy	ECC Response	Summary	CPBC officer response	Modification
	this relate, can be funded and delivered by particular development sites/clusters. ECC seek reference should also be made to the provision of a mobility hub at Benfleet Station consistent with Policies T1, Criteria 5 and T4, Criteria 6.	relate to development coming forward and how they would be delivered to development funded. Provision of a mobility hub at Benfleet Station should be included in the criteria	Reference made to the provision of a mobility hub at Benfleet Station	<u>Create a mobility hub at Benfleet Station</u>
(33) Policy B6 – 159-169 Church Road, Benfleet, Additional Criteria, Page 60	ECC notes that the site allocation is within a Waste Consultation Area in relation to a waste site on Armstrong Road (ref ESS/37/18/CPT). It is requested that this is reflected in the text of the policy and includes reference to the need for a Waste Infrastructure Impact Assessment as part of any subsequent application.  Proposed Text  <i>The site is located within a Waste Consultation Area regarding the waste site at Armstrong Road. As a result, a Waste Infrastructure Impact Assessment should be undertaken.</i>	The site is within a Waste Consultation Area at Armstrong Road and a Waste Infrastructure Impact Assessment would be required. This should be referenced in the policy	Accepted and additional text added requiring a Waste Infrastructure Impact Assessment	Add additional Criteria 5. <i>A Waste Infrastructure Impact Assessment is undertaken given the site is located within a Waste Consultation Area in relation to the waste site on Armstrong Road.</i>
(34) Policy B6 – 159-169 Church Road, Benfleet, Reasoned Justification, Page 60	ECC notes that the site allocation is within a Waste Consultation Area in relation to a waste site on Armstrong Road (ref ESS/37/18/CPT). It is requested that this is reflected in the text of the policy and includes reference to the need for a Waste Infrastructure Impact Assessment as part of any subsequent application.	The site is within a Waste Consultation Area at Armstrong Road and a Waste Infrastructure Impact Assessment would be required. This should be referenced in the reasoned justification	Accepted and additional text added requiring a Waste Infrastructure Impact Assessment in the reasoned justification	See above additional criteria added  ECC require the reasoned justification is amended to read:  <u><i>The site is located within a Waste Consultation Area regarding the waste site at Armstrong Road. As a result, a Waste Infrastructure Impact</i></u>

Policy	ECC Response	Summary	CPBC officer response	Modification
				<u>Assessment should be undertaken</u>
(35) Policy B8 – Manor Trading Estate, Criteria 4, Page 62	ECC seek Criteria 4 also makes reference to providing biodiversity net gain to be consistent with other plan policies.	Reference should be made to providing biodiversity net gain for this policy	Accepted and additional text added requiring biodiversity net gain	Amend criteria 4 to read <i>Improved public realm which creates space for pedestrians and cyclists to move around. The public realm strategy should integrate urban greening, <u>biodiversity net gain</u> and incorporate sustainable drainage into the approach to materials and landscaping</i>
(36) Policy Had1 – Hadleigh Town Centre, Criteria 6, Page 67	To provide consistency with other policies in the Plan and to ensure that any masterplan has regard to the guidance and standards set out in the EPOA Parking Guidance.	Masterplan of this site should have regard for the EPOA Parking Guidance for this policy	Accepted and additional text added to reference EPOA Parking Guidance	Amend Criteria 6 to read: <i>A car parking strategy that provides the level of car parking required to meet foreseen demand and accessibility between commercial areas and car parking <u>having regard to the EPOA Parking Guidance</u></i>
(37) Policy Had1 – Hadleigh Town Centre, Criteria 8,	ECC support reference to opportunities for urban greening in the town centre (Criteria 8). Town centres present a valuable opportunity for urban greening, which can enhance public spaces, improve biodiversity, and support climate resilience. This could include greening streets,	EEC supports this policy and reference to opportunities for urban greening in Hadleigh Town Centre. Suggest further justification text around the delivery of green infrastructure.	Accepted and additional text referring to urban greening added	10.6 Improved environmental conditions <u>including urban greening</u> <del>within the town centre could</del> <u>can help to create an</u>

Policy	ECC Response	Summary	CPBC officer response	Modification
	creating attractive and welcoming town squares, and integrating green infrastructure into new developments. Further, supporting justification could be provided in the reasoned justification outlining how this will be delivered, consistent with paragraph 18.32			<del>enhanced town centre offer, the attractiveness of the town centre including along with an improved evening and leisure offer. Useful guidance can be found in Home - Nature Towns &amp; Cities.</del> A banking hub is also desired to enable residents and local businesses to have access to shared banking services.
(38) Policy Had2 – Hadleigh Country Park, Hadleigh Farm and Benfleet and Southend Marshes, Criteria 1, Page 70	ECC welcome reference to support proposals related to the improvement of recreational facilities within the Country Park and its maintenance. This is supported by Policy Infra4 – Open Spaces, Criteria 5 which requires major development to make a contribution towards improving the quality, quantity and/or accessibility of nearby open space provision, recognising the impact increased intensity of use may have on that space. ECC consider this is relevant to Hadleigh Country Park in order to mitigate the intensification if uses from development. Development proposals must give consideration to the impact on ECCs Country Parks, including Hadleigh Country Park, and seek to secure infrastructure and/or environmental mitigation as may be set out in appropriate management plans for these Parks. Consideration should also ensure that consideration is given to accessibility to, and within, Country Parks by active and sustainable travel modes, and funding is provided for their longer term maintenance and lifecycle replacement consistent with Policy T3.	Supports policy for requiring proposals to improve recreational facilities at Hadleigh Country Park and their maintenance consistent with other policies in the Plan.	Noted	No Mods



Policy	ECC Response	Summary	CPBC officer response	Modification
(39)Policy Had4 - Land South of Scrub Lane, additional Criteria, Page 73	ECC notes the policy states that proposals must comply with all other relevant policies in the Plan. However, ECC recommended that developments are required to demonstrate the delivery of multifunctional GBI and biodiversity net gain to ensure their integration into development design and delivery.	Recommends adding an additional criteria that developments required to demonstrate delivery of multifunctional GI and BNG	Accepted and additional criteria added to policy to require developments to demonstrate the delivery of multifunctional GI and BNG	Add an additional Criteria to read: <u>7. Provides opportunities for multifunctional green infrastructure and biodiversity net gain</u>
(40) THUN 1 Thundersley Centre, additional Criteria, Page 75	ECC seek an additional Criteria is included referencing the need for urban greening and biodiversity net gain consistent with Policy C1, criteria 10.	Recommends additional criteria to policy to reference urban greening and BNG	Accepted and additional text referring to urban greening added	Add an additional criteria to read <u>4. Provides opportunities for greening the centre and biodiversity of net gain at street level and above.</u>
(41) Policy Thun2 – Kiln Road Campus, Paragraph 1 and Paragraphs 11.11 and 11.12, Page 76	ECC notes that the land proposed for allocation at Kiln Road comprises a significant re-development of a brownfield site which is currently home to USP College. It is recommended that officers ensure master plan proposals for Kiln Road prioritise the preservation of the USP college and its educational and recreational offerings after or during the development of the new campus. ECC would welcome opportunities for further discussions on to ensure the site is able to come forward in a way that is environmentally, economically and socially sustainable	The redevelopment of Kiln Road should ensure that preservation of USP college facilities on or offsite is prioritised during the masterplan process. ECC Welcome involvement in the master planning of the site	Accepted. CPBC will work with all stakeholders to ensure that the educational and recreational facilities are preserved for the community.	No Mods
(42) Policy Thun2 – Kiln Road Campus, Criteria 2, Page 76	Prior to submission, ECC will need to undertake a cumulative assessment of the growth consistent with Section 3.4 of the Essex County Council Local and Neighbourhood Planners' Guide to School Organisation and Place Planning (September 2025) for education and	A further cumulative assessment is recommended to assess the early years provision requirement as a result of development at Kiln Road.	Accepted. CPBC will work with ECC to undertake a further cumulative assessment to identify the necessary primary,	Amend criteria 2 to read <i>A new 56 place stand alone early years and childcare nursery</i> <del>on</del>

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	<p>early years and childcare. The assessment must be consistent with the updated ECC Developer's Guide for Infrastructure Contributions (September 2025) and reflecting the updated DfE Scorecard (Q1 2025) costs for education provision per place. This will confirm the potential requirement for a new 56 place nursery to meet local demand.</p> <p>ECC needs to ensure that the delivery of ECC's infrastructure and services are commensurate with the growth being planned. Such requirements cannot place an unaffordable cost burden on the public purse or require early intervention to retrofit or "make good".</p>		<p>secondary, early years education and childcare and SEND requirements including any requirements on the development proposals at Kiln Road Campus.</p> <p>In January 2026, ECC provided addendums to the education assessments previously undertaken in November 2025.</p>	<p><del>0.13 hectares</del> <u>(Use Class E(f) on 0.18 hectares of suitable land allocated for education use</u></p>
(43) Policy Thun2 – Kiln Road Campus, additional Criteria , Page 76	<p>Paragraph 11.16 highlights that parts of the site experience surface water challenges. Consequently, it is essential that any master planning of the site is undertaken in accordance with Policy SD3 – Sustainable Drainage Systems (SuDS) including incorporating water management measures to reduce surface water run-off and the submission of a drainage strategy to demonstrate how both on and off-site flood risk will be managed and mitigation measures should be satisfactorily integrated into the design and layout of the development</p>	<p>An additional criteria should be added to ensure that sustainable drainage systems are included in the master planning due to potential for surface water challenges</p>	<p>Accepted an additional criteria has been added to require SuDS to be considered as part of the master plan process for the site.</p>	<p>Add additional criteria <u>9: Proposals should demonstrate how SuDS will be incorporated into the masterplanning of the site in accordance with Policy SD3</u></p>
(44) Policy Thun2 – Kiln Road Campus, additional Criteria , Page 76	<p>ECC support the requirement for a masterplan, approved by CPBC, to be in place prior to the submission of a planning application. Masterplans should encourage a landscape-led approach to design to ensure that GBI, biodiversity, and climate resilience, and the ELNRS are considered from the outset, shaping development around the natural environment rather than retrofitting it.</p> <p>For clarity, an additional criterion should be added requiring developments to demonstrate the delivery of GBI</p>	<p>Supports requirement for a masterplan that should be approved by CPBC prior to submission of planning application. The design of the scheme should be landscape-led to ensure GBI and BNG are integrated into the design from the onset.</p>	<p>Accepted. Agreed that scheme designs should be landscape led and masterplans should be approved by CPBC prior to submission of the planning application.</p>	<p>Add additional criteria: <u>10: Provide opportunities for greening the centre and biodiversity of net gain at street level and above</u></p>

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	and BNG. This ensures that environmental enhancements are not just implied but actively integrated into the design and delivery of development		Given additional criteria 9 and 10 existing criteria 9 is amended to criteria 11.	
(45) Policy Thun 4 – Green Space Connectivity	ECC support the principle of this policy in seeking to secure green spaces as part of the GI network. ECC seeks further clarification as to whether the site has been or will be registered on the Biodiversity Gain Site Register, which is a requirement before any credits can be sold or the LPA accepts contributions from a developer for off-site gains. Registration ensures the site is publicly recorded, has the necessary legal agreements and management plans are in place, and that it is secured for the minimum 30-year duration of the net gain.	Clarification whether any biodiversity offsetting will be registered on the Biodiversity Gain Site Register	Any Biodiversity Gain Offsite Opportunities will be registered on the Biodiversity Gain Site Register.	No Mods
(46) Chapter 12 – Daws Heath –	No Comment			No Mods
(47) Chapter 13 Policy Hou4 - Specialist Housing Requirements, Page 90	<p>ECC support the amendments to Policy Hou4 since the Regulation 18 consultation which align with the Essex Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025)., namely:</p> <ul style="list-style-type: none"> <li>• Criteria 1a - 100% of all new homes will be built to standard M4(2) and Part 1b - 10% of all new homes will be built to standard M4(3) which supports inclusive and adaptable housing; and</li> <li>• Criteria 2c – requiring specialist housing to be located in areas with good access to shops and services and a placement preference for Essex residents, which supports local access for vulnerable adults.</li> <li>• Criteria 2d – a condition will be attached to the grant of permission giving placement preference to Essex residents. ECC notes that supported housing schemes for children in care and vulnerable adults</li> </ul>	Supports Policy Hou4 which aligns with Essex Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA 2025)	Noted	<p>Amend Criteria 2a to read</p> <p><i>Proposals that contribute towards the delivery of 1,056 retirement/ sheltered homes and 594 extra care units for older people which should have regards to the SSHANA (2025) and provide mixed tenure of market and affordable/social rental over the Plan period in locations with good</i></p>

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	are typically small-scale and integrated within wider developments. Due to market pressures, local access to such accommodation can be constrained, resulting in placements outside the borough. ECC therefore supports policy mechanisms that prioritise local access to supported housing, enabling children and adults to remain close to family, education, and care networks. This aligns with ECC's statutory duties under the Children Act 1989 and Care Act 2014, and supports the delivery of inclusive, community-based care.			<i>access to shops and services.</i>
(48) Policy Hou4 -Specialist Housing Requirements, Criteria 2a, , Page 90	<p>ECC support the amendments to Criteria 2a since the Regulation 18 consultation which align with the Essex Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025)., namely:</p> <ul style="list-style-type: none"> <li>Part 2a – reference to quantified targets for 1,056 retirement/sheltered homes and 594 extra care units for older people;</li> </ul> <p>However, the following concerns raised in the Regulation 18 Plan still need to be addressed, namely:</p> <ul style="list-style-type: none"> <li>Tenure split: Policy Hou4 2a does not distinguish between market and affordable/social rent provision. The SSHANA (2025) identifies a clear need for both, and ECC recommends that the policy reflects this to ensure balanced delivery.</li> </ul>	Supports Policy HOU4 Specialist Housing Requirements but the policy needs to distinguish between market and affordable/social rent provision in criteria 2a for HOU4	<p>An update to the SSHANA (2025) was provided in December 2025, post the Regulation 19 consultation, setting out the tenure split between market and affordable/social rent for retirement/ sheltered homes and extra care units for older people The previously published SSHANA did not clearly set out the tenure split and has not been scrutinised or viability tested as part of the Plan viability assessment..</p> <p>It is required that future development proposals should have regard to the tenure requirements set out</p>	

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			<p>in the SSHANA within their planning application process.</p> <p>These requirements are:</p> <ul style="list-style-type: none"> <li>• Retirement /sheltered housing (1056 homes) of which 802 are market housing and 253 affordable/social housing</li> <li>• Extra care housing (594 homes) of which 421 homes are market housing and 173 homes are affordable/social housing</li> </ul>	
(49) Policy Hou4 -Specialist Housing Requirements, Criteria 2b, Page 90	<p>ECC support the amendments to Policy Hou4 since the Regulation 18 consultation which align with the Essex Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025)., namely:</p> <ul style="list-style-type: none"> <li>• Part 2b - reference to quantified targets for 138 residential care beds, and 139 nursing care beds;</li> </ul>	Supports Policy Hou4 requires clarification on term nursing care beds to align with SSHANA	Accepted wording changed from extra care beds to nursing care beds	<p><i>Amend criteria 2 b to read</i></p> <p><i>Proposals that contribute towards the delivery of 138 residential care beds and 139 extra <u>nursing</u> care beds over the Plan period.</i></p>

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(50) Policy Hou4 - Providing the Right Types of New Homes, Paragraph 13.34; 13.37 and 13.39, Page 90/91	ECC welcome reference to the Essex Supported and Specialist Housing Needs Assessment 2025 in paragraphs 13.34, 13.37 and 13.39, although reference should also be made to the ECC Extra Care Design Guide (2023) and ECC Market Position Statement (2023).	Supports reference of SSHANA in this policy but also should reference ECC Extra Care Design Guide (2023) and ECC Market Position Statement (2023)	Accepted references to ECC Extra Care Design Guide (2023) and ECC Market Position Statement (2023) added	Reference the evidence base supporting this policy should also refer to the ECC Extra Care Design Guide (2023) and ECC Market Position Statement (2023). Add to paragraph 13.39. <u>Development proposals for extra care accommodation should refer to the ECC Extra Care Design Guide (2023) and ECC Market Position Statement in their designs</u>  Add document ECC Extra Care Design Guide (2023) to evidence base and add ECC Market Position Statement (2023) to evidence base <u>Extra Care Design Guide 2023 and Market Position Statement   Provider Hub   Essex</u>
(51) Paragraph 13.2, Page 85	Reference should be made to the Supported and Specialist Housing Needs Assessment (May 2025) which covers people with a learning disability, including young people with learning disability/autism; Autistic people; Vulnerable	Need to reference the Supported Specialist Housing Needs Assessment (May 2025) when	Accepted and referenced made to SHHANA (2025)	Amend paragraph 13.2 to read <i>The Borough continues to have a range of</i>

Policy	ECC Response	Summary	CPBC officer response	Modification
	young people including care leavers; Children in Care; People with mental health needs; People with a physical/sensory disability, including wheelchair users ; Victims, survivors and perpetrators of domestic abuse; Older people (65+), ; and People with lower-level needs who may not draw on adult social care from Essex County Council but have support needs that affect their housing and/or accommodation.	considering Castle Point's housing needs		<i>housing needs, and these have been identified through a Local Housing Needs Assessment <u>and the Supported and Specialist Housing Needs Assessment (May 2025)</u></i>
(52) Hou6 Gypsy and Traveller Provision, Page 93	ECC supports the approach to meeting identified needs for additional Gypsy and Traveller accommodation. Ongoing collaborative work on Gypsy and Traveller accommodation across Essex, through the EPOA and other strategic planning groups is recommended. Furthermore, it is important for the borough to continue to engage with the ongoing EPOA programme of work to identify the need for a transit site within Essex, with any outcomes of this work factored into reviews of the Plan.	EEC supports approach to meeting Gypsy and Traveller Accommodation in Castle Point	Noted. CPBC will continue to collaborate with neighbouring authorities through EPOA to identify the need for a transit site.	No Mods
(53) Policy E1- Development on Strategic Employment Land, Criteria 2, Page 95	ECC seek masterplans should be 'approved' rather than 'agreed' by the council prior to the determination of any planning application and should set out the development principles and supporting evidence. An approved masterplan will accord significant weight in the determination of planning applications by CPBC. This is consistent with Policy D3 - Master Planning, criteria 1 which states: <i>Where this Plan requires the use of Master Plans for allocated sites, these will be approved by the Council in advance of the determination of any planning application.</i>	Masterplans should be approved by the council prior to determination of any planning application	Accepted CPBC agree that masterplans should be approved prior to any planning application	Criteria 2 is amended to read: <i>Within Strategic Employment Areas, and until such time as a Master Plan is <u>approved</u> <del>agreed</del>...</i>

Policy	ECC Response	Summary	CPBC officer response	Modification
(54) Policy E3 - Development of Local Skills, Criteria 1, Page 99	ECC requires all strategic scale planning applications of 50 or more homes or employment space providing 2,500sqm (GIA) or more floorspace, to enter into an Employment and Skills Plan to provide employment and skills opportunities to benefit the local community as referenced in paragraph 14.41. ECC requires this to be incorporated into Criteria 1 to afford it the necessary weight in determining planning applications.	Need to specify that major applications need to provide employment and skills plans with their applications	Accepted additional text requiring employment and skills plans with major applications	Amend Criteria 1 to read: <i>Require major developments to be supported by <del>Employment education</del> and <del>Skills Plans</del> that demonstrate how local training and employment opportunities will be delivered by the development during the construction phase</i>
(55) Policy E3 - Development of Local Skills, reasoned justification, new paragraph, Page 100	Reference should be made to the Essex and Thurrock Local Skills Improvement Plan (2023) which identifies key skills gaps and identifies key priorities to be delivered through partnerships between employers, training providers, and local authorities to meet the evolving needs of the local economy.	Add reference to the Essex and Thurrock Skills Improvement Plan (2023)	Accepted and reference added.	Add an additional paragraph after 14.40  <i><u>The Essex and Thurrock Local Skills Improvement Plan (2023) identifies key skills gaps and aims to create a more flexible, responsive education and training system. Key priorities include boosting soft skills, enhancing green skills for a low-carbon economy, developing digital skills, expanding apprenticeships, improving careers guidance, and</u></i>



Policy	ECC Response	Summary	CPBC officer response	Modification
				<p><u>simplifying the landscape for training providers and employers. The plan emphasises stronger partnerships between employers, training providers, and local authorities to meet the evolving needs of the local economy.</u></p> <p>Add to evidence the Essex and Thurrock Local Skills Improvement Plan (2023) <u>Local skills improvement plan</u></p>
(56) Policy E1- Development on Strategic Employment Land, Paragraph 14.10, Page 95	Paragraph 4.10 makes reference to the employment forecasting for the Plan being drawn from the Experian Economic Land Demand forecast for Castle Point September 2024. This should be added to the Local Plan evidence base.	Add the Experian Land Demand Forecast for Castle Point September 2024 to the evidence base	Accepted reference added	Add to the evidence base the Experian Economic Land Demand forecast for Castle Point September 2024.
(57) Hot Food Takeaways and Fast Food Outlets, Paragraph 15.31, Page 109	ECC welcome references to the role of unhealthy food advertising within Policy TC5 and to reference the National Obesity Strategy evidence on how eat out contributes to obesity	Supports this policy and the references to the role that unhealthy food advertising has on health and how eating out contributes to obesity as evidenced in the National Obesity Strategy.	Accepted and additional text added referencing National Obesity Strategy's evidence	<p>Amend paragraph 15.31 to read:</p> <p><i>.....in our town centres and local communities. The national Obesity Strategy highlights that</i></p>

Policy	ECC Response	Summary	CPBC officer response	Modification
				<i>eating out can contribute towards obesity through the consumption <u>of out of home food which is high in fat, salt and sugar (HFSS).</u> Takeaways and promotions in food stores <u>and high street environment</u> can also add to the number of calories consumed.</i>
(58) Policy TC5 – Hot Food Takeaways and Fast Food Outlets, Paragraph 15.32, Page 109	To provide additional detail to statements around local obesity ECC seek reference is made to the National Child Measurement Programme (NCMP) in paragraph 15.32.	Reference should be made to the <i>National Child Measurement Programme (NCMP)</i> to provide additional detail around local obesity	Accepted and reference made to National Child Measurement Programme	Amend sentence in paragraph 15.32 to read  <i>This is significant in Castle Point where obesity levels are higher than the national average, <u>with insight from the annual National Child Measurement Programme (NCMP) which monitors the Body Mass Index (BMI) of children in reception and year six.</u></i>
(59)	ECC supports the approach to manage hot food takeaways and fast-food outlets in the borough, in accordance with	Supports this policy and the management of hot food	Noted and agreed. No modification.	No Mods

Policy	ECC Response	Summary	CPBC officer response	Modification
Policy TC5 – Hot Food Takeaways and Fast Food Outlets, Paragraph 15.33, Page 109	<p>Paragraph 97 of the NPPF (December 2024). This paragraph recognises the role of planning in shaping the local food environment and explicitly states that:</p> <p><i>"Local planning authorities should refuse applications for hot food takeaways and fast-food outlets within walking distance of schools and other places where children and young people congregate, unless the location is within a designated town centre; or in locations where there is evidence that a concentration of such uses is having an adverse impact on local health, pollution or anti-social behaviour"</i></p> <p>Evidence shows that:</p> <ul style="list-style-type: none"> <li>• Hot food takeaways tend to serve food higher in calories than meals prepared at home.</li> <li>• Their numbers are increasing, particularly in areas of deprivation.</li> <li>• These outlets are often concentrated in communities with higher levels of obesity.</li> <li>• There is growing public concern of the intense promotion of unhealthy food in some places and, especially its impact on children and young people</li> </ul> <p>ECC acknowledges that Use Class E(b) is intended to capture premises that operate as restaurants, where food is consumed on-site. However, in practice, some of these establishments may function more like hot food takeaways due to minimal seating and a business model focused on off-premises consumption. Since September 2020, hot food takeaways have been classified as sui generis, requiring planning permission for change of use.</p> <p>NPPF (2024) empowers councils to capture a broader category of 'fast food outlets', including fast food restaurants that may not fall under the sui generis classification. This provides councils with greater</p>	takeaways and fast-food outlets in the borough to include restaurants which offer takeaway services.		

Policy	ECC Response	Summary	CPBC officer response	Modification
	flexibility to influence the location of outlets serving less healthy food and drink. However, the term 'fast food outlets' is not yet defined in planning law or regulation, and the Planning Practice Guidance (PPG) has not been updated to provide clarity on this definition.			
(60)Policy TC5 – Hot Food Takeaways and Fast Food Outlets, Paragraph 15.37, Page 109	Paragraph 15.37 makes reference to the proliferation of hot food takeaway provision in Castle Point contributing towards poor health amongst the resident population. Policies restricting children’s access to takeaway shops can, amongst other measures, act to discourage unhealthy eating and seek to stop the rising levels of obesity in the Borough. Reference should be made to the Castle Point and Rochford Health and Wellbeing Strategy (2022 – 2027) in paragraph 15.37.	Reference the Castle Point and Rochford Health and Wellbeing Strategy (2022-2027) which makes reference to hot food takeaways and poor health	Accepted however the document is Rochford and Castlepoint Health and Wellbeing Strategy updated February 2025. Strategy 2025-2028	Add reference to the <i>Castle Point and Rochford Health and Wellbeing Strategy</i> in paragraph 15.37.  <i>Therefore, the proliferation of hot food takeaway provision in Castle Point is not only affecting the diversity of retail offer in Castle Point, but also contributing towards poor health amongst the resident population, <u>With reference to the Castle Point and Rochford Health and Wellbeing Strategy (2025-2028), there is therefore a clear basis...</u></i>
(61) Policy TC5 – Hot Food Takeaways and Fast Food Outlets,	ECC welcome references to the Essex Healthy Weight Strategy. It is important to recognise that this approach is a part of a bigger system activity and that we recognise that our efforts in other areas can be undermined if we are not able to suitably address the food environment.	ECC welcomes reference to the Essex Healthy Weight Strategy within policy TC5	Accepted and reference added to Essex Health Weight Strategy	Amend paragraph 15.36 to read: <i><u>As a part of a wider package of local and system activity, the Essex Healthy Weight Strategy (2024 – 2034),</u></i>

Policy	ECC Response	Summary	CPBC officer response	Modification
paragraph 15.36, Page 109				<i>prioritises addressing factors....</i>
(62) Policy TC5 – Hot Food Takeaways and Fast Food Outlets, paragraph 15.38, Page 109	ECC welcome references to the role of unhealthy food advertising within Policy TC5 and how the food environment impacts children and young people and requests further explanation to be added into the justification	ECC welcomes the reference to the role that unhealthy food advertising plays within Policy TC5 and request some additional information added.	Accepted and additional text added	Amend paragraph 15.38 to read: <i>The NPPF supports the restriction of hot food takeaways and fast-food outlets around schools. <u>Food choices, preferences and habits are formed at an early age</u> and children are known to be increasingly more vulnerable to obesity that adults. Whilst there is a range of reasons – <u>poor diet quality and diversity at home, lack of exercise or sedentary lifestyles</u> – the access to fast food takeaways is of concern. Restricting access close to schools will assist to discourage children from unhealthy eating and assist in controlling obesity.</i>
(63) Policy D1 - Achieving Well	ECC consider objective “o” and the reasoned justification do not fully reflect the principles of inclusive design as	To make reference to design principles for Specialist Supported Housing within Policy	Accepted reference to design principles for	Amend objective o to read: .

Policy	ECC Response	Summary	CPBC officer response	Modification
Designed Places, objective o, Page 112	<p>set out in NPPF paragraph 135f, which requires planning policies to ensure developments are inclusive, accessible, and promote health and wellbeing. Policy D1 does not currently reference these inclusive design principles or the needs of people who require Specialist Supported Housing, including extra care housing, supported living, wheelchair-accessible homes, and other forms of accommodation for people with physical, sensory, cognitive, and mental health needs.</p> <p>The suggested amendment will enable the creation of inclusive communities, recognising that people with care and support needs may live in general housing and participate in wider community life</p>	D1 in order to create inclusive communities and that people with care and support may live in general housing and participate in wider community life.	Specialist Supported Housing added.	<p><i>Ensure opportunities for accessible and inclusive design are taken, <u>enabling people to age well in place and reflecting</u> <del>taking into account</del> the needs of different cultures, <del>and</del> genders <u>and</u> <u>disabilities</u>.</i></p> <p>Add these ECC documents to the evidence base to support inclusive design standards, including:</p> <ul style="list-style-type: none"> <li>• ECC Extra Care Design Guide (2023);</li> <li>• Supported Living Accommodation Standards (2023);</li> <li>• Essex Design Guide (2018); and</li> <li>• Essex Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025)</li> </ul>
(64)	ECC seek an additional criteria requiring development to incorporate multifunctional green and blue infrastructure	Multifunctional green and blue infrastructure should be designed	Accepted Additional text added to incorporate	Add an additional Criteria to read:

Policy	ECC Response	Summary	CPBC officer response	Modification
Policy D1 - Achieving Well Designed Places, additional criteria, Page 112.	<p>into the design process from the outset rather than it being an optional requirement.</p> <p>This is consistent with the NPPF, which incorporates green design principles by promoting sustainability (paragraph 16a), efficient use of land (paragraph 129), and biodiversity (paragraph 187a), mitigation and adaptation of climate change (paragraph 20d), the inclusion of trees in new developments (paragraph 136), and improved design quality (paragraph 137). This is further supported by recommendations and advice provided in the Essex Green Infrastructure Strategy Objectives to create high quality multifunctional GI and improve connectivity between people and wildlife. The ELNRS promotes the use of nature-based solutions, such as green roofs, urban greening, green corridors, and sustainable urban drainage systems in new development projects, to enhance biodiversity, mitigate climate change impacts and improve quality of life for residents.</p> <p>The Green Infrastructure Planning and Design Guide, published by Natural England, provides practical, evidence-based guidance on integrating nature-rich, climate-resilient green infrastructure into new developments and public spaces. It supports planners and designers in delivering high-quality, multifunctional landscapes that benefit both people and nature.</p> <p><a href="https://designatedsites.naturalengland.org.uk/GreenInfrastructure/downloads/Design%20Guide%20-%20Green%20Infrastructure%20Framework.pdf">https://designatedsites.naturalengland.org.uk/GreenInfrastructure/downloads/Design Guide - Green Infrastructure Framework.pdf</a></p>	into the development at the outset to ensure that principles of biodiversity improvements, climate change adaptation and wellbeing are successfully achieved.	multifunctional green and blue infrastructure into scheme designs	<u><i>p. Incorporate multifunctional Green and Blue Infrastructure (GBI) into the design to enhance biodiversity, support climate resilience, and improve the quality and connectivity of open spaces</i></u>
(65) Paragraph 16.21, Page 113	ECC welcomes the references to sheltered and care accommodation in paragraph 16.21, which is consistent with ECC's strategic priorities and the ECC Extra Care Design Guide (2023).	Welcomes references to sheltered and care accommodation within Policy D1	Noted	No Mods

Policy	ECC Response	Summary	CPBC officer response	Modification
(66) Paragraph 16.28, Page 114	<p>ECC welcomes the emphasis on accessible and inclusive design in paragraph 16.28, which is consistent with ECC’s strategic priorities and the ECC Extra Care Design Guide (2023).</p> <p>However, some refinements are suggested to align with ECC’s strategic priorities and align with NPPF, paragraph 135f which requires planning policies to promote inclusive, accessible development that support health and wellbeing.</p> <p>Additional text to 16.28 of</p> <ul style="list-style-type: none"> <li>• refer to dementia-inclusive communities, in line with current terminology and best practice;</li> <li>• refer to enabling people to age well and in place as a core principle of inclusive design.</li> <li>• reflect the needs of people with a range of support needs, including those with cognitive, sensory, mental health, and physical disabilities.</li> <li>• ensure inclusive design expectations include: • Dementia-inclusive features;</li> <li>• Wayfinding and sensory elements;</li> <li>• Adaptable layouts</li> <li>• Accessible outdoor spaces;</li> <li>• Consideration of the needs of different cultures, genders, and disabilities</li> </ul>	Provide further reference to inclusive and accessible development	CPBC agrees that development should endeavour be accessible to all abilities, but the justification text refers to the necessity of development to be permeable and accessible to allow public walking and cycling routes throughout. To add highly specific specialist accessibility design criteria would lose the active travel elements	<p>Required Add additional paragraph 16.28 to read</p> <p><u>Development proposals should have regard to the ECC Extra Care Design Guide principles to ensure opportunities for accessible and inclusive design are taken into account, enabling people to age well in place and reflecting the needs of different cultures, genders and disabilities</u></p>
(67) Policy D1 - Achieving Well Designed Places, Criteria h, Page 112	ECC support Criteria “h” which requires new development to provide and enhance existing and safe convenient pedestrian and cycle routes. Developers should have regard to the Castle Point and Essex Wide LCWIP to seek the provision of any or contribute to and part of an identified route.	Supports the provision of more and enhanced pedestrian and cycle routes. Developers should have regard to the Castle Point Local Cycling and Walking Infrastructure Plan (LCWIP) and the Essex Wide LCWIP	Noted	No Mods



Policy	ECC Response	Summary	CPBC officer response	Modification
(68) Policy D2- Design on larger sites and within premium sustainability areas, Criteria 2b, Page 115	<p>ECC agrees that a distance of 400m from a bus stop is a key benchmark representing a reasonable walking distance for people of all abilities to access public transport services. This standard is often used in policy and design guides to ensure that new developments and existing communities are well-served by bus networks, promoting active travel and sustainable transport use.</p> <p>Further clarification is necessary to demonstrate that premium sustainability areas do not have to meet both 2a and b, but that either sites within 800m of a town centre or railway station or sites within 400m of a bus stop are considered premium sustainability areas.</p>	Additional clarification around meeting the sustainability criteria of access to services this should be either 400m walking distance to a bus stop or 800 m of a town centre	Accepted clarification made	Make following change: 'or' replaces 'and' in Criteria 2a and b
(69) Policy D2- Design on larger sites and within premium sustainability areas, Criteria 2b, Page 115	<p>ECC agrees that a distance of 400m from a bus stop is a key benchmark representing a reasonable walking distance for people of all abilities to access public transport services. This standard is often used in policy and design guides to ensure that new developments and existing communities are well-served by bus networks, promoting active travel and sustainable transport use.</p> <p>ECC consider that a bus stop <i>per se</i> is not a good indicator of “premium sustainability” as they may be served by no buses or by irregular and/or infrequent bus services.</p> <p>Proposed text  <i>A frequent bus service is generally regarded as 4 buses or more serving the stop during the morning and evening peak (excluding school buses) and a good range of services at other times.</i></p>	Agrees that walking distance of 400m to a bus stop is a key benchmark for sustainability but the frequency of the bus service should be defined within the justification text.	CPBC agree that for the sustainable criteria to be reached a sufficient provision of bus stop times during peak hours should be available from the bus stop.	<p><i>Updtate to Policy D2: Premium sustainability areas are defined as:</i></p> <p><i>a: sites within 800m of a town centre or railway station <u>or</u> <del>and</del></i></p> <p><i>b: Sites within 400m of a bus stop <u>with a regular bus service</u>.</i></p> <p><i>New sentence to be added to para 16.34:</i></p> <p><i><u>A distance of 400m from a bus stop is a key benchmark representing a reasonable walking distance for people of all abilities to access public transport services. “The service</u></i></p>

Policy	ECC Response	Summary	CPBC officer response	Modification
				<i>should provide a good level of frequency in order to make reasonable journeys to work, school and to access community services.</i>
(70) Policy D4 – Landscaping, Criteria 2, Page 117	ECC seek a typo is amended to read `streams' in Criteria 2.	Typo. Amend to “streams”	Accepted and corrected	Amend “steams” to “streams” in criteria 2
(71) Policy D4 – Landscaping, Criteria 3, Page 117	ECC welcome that any tree planting should be required to consider the maintenance issues associated with street tree planting and the need to work with highways officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users consistent with NPPF, paragraph 136. ECC require the reasoned justification makes reference to the need to consider the <i>Essex Design Guide and Highways Technical manual planting in Sight Splays</i>	Welcomes that maintenance issues are considered with the planting of trees. Reference should be made to the Essex Design Guide and Highways Technical Manual Planting in Sight Splays.	Accepted and references added	Add additional sentence to criteria 3  <i>The most appropriate tree should be planted within the development; <del>compatible with highways standards</del> having regard to the <u>Essex Design Guide, Highways Technical Manual - Planting in Sight Splays</u> and the needs of different users</i> .
(72) Policy D4 – Landscaping,	ECC recommend Criteria 4 makes reference to the Green and Blue Infrastructure (GBI) network, as landscaping plays a key role in delivering and connecting GBI across	Recommends reference is made to the GBI network in the design of landscape schemes	Accepted and references added	Add additional Criteria in 4 to read:

Policy	ECC Response	Summary	CPBC officer response	Modification
Criteria 4, Page 117	developments and the wider area. This is consistent with the Green Infrastructure Framework Design Guide and supports delivery of local strategies like the ELNRS and South Essex GBI Strategy.			<i>e. <u>Connectivity to the wider Green and Blue Infrastructure (GBI) network by enhancing ecological connectivity, supporting biodiversity, and integrating nature-based solutions that promote climate resilience.</u></i>
(73) Policy D4 – Landscaping, Criteria 5, Page 117	ECC support the policy setting out a clear requirement for landscaping and planning condition requirements for management and maintenance plans	Supports policy for setting planning conditions for management and maintenance of landscape schemes	Noted	No Mods
(74) Policy GB1 – Development affecting the Green Belt, Criteria 1, Page 127	ECC seek Criteria 1 is amended to provide clarity that inappropriate development in the Green Belt will not be supported except in very special circumstances for consistency with NPPF, paragraph 17.14. ECC require Criteria 1 is amended to read: <i>Within the Green Belt, as defined on the Policies Map, inappropriate development will not be supported except in very special circumstances.</i>	Request amendment to policy to include that development would be accepted in special circumstances within Green Belt	Accepted. Text amended.	<i>Amend criteria 1 to read</i>  <del>Development</del>  <i><u>Within the Green Belt, as defined on the Policies Map, inappropriate development will not be supported except in very special circumstances</u> <del>in line with the NPPF.</del></i>
(75)	3. Effective	Requires that the following School Sites are removed from	Not accepted. The Castle Point Plan is a new plan	No Mods

Policy	ECC Response	Summary	CPBC officer response	Modification
Paragraph 17.9, Page 128	<p>Policy GB1, Criteria 1 states that the Green Belt boundaries are defined on the Policies Map and that development within the Green Belt will not be supported in line with the NPPF. ECC requires that school sites are removed from the Green Belt, where appropriate to enable any future school expansion necessary to meet pupil demand not being required to demonstrate an <i>'exceptional circumstance'</i> to development in the Green Belt. Any school sites removed from the Green Belt should then be allocated as education land on the Policies Map.</p> <p>This is consistent with Paragraph 43 of the Inspectors Report to the 'withdrawn' Local Plan.</p> <p>Please refer to the response regarding amendments to the Policies Map</p> <p>ECC seek reference is made in Paragraph 17.9 to identify those school sites to be removed from the Green Belt and the realignment of the green belt boundary consistent with the Main Modification 67 to the 'withdrawn' Local Plan and consistent with the Inspector's recommendation. These school sites were:</p> <ul style="list-style-type: none"> <li>• King John School, Benfleet;</li> <li>• The Deanes School, Benfleet;</li> <li>• Glenwood School, Benfleet;</li> <li>• Kents Hill Infants and Junior School, Benfleet;</li> <li>• Holy Family Catholic Primary School, Benfleet;</li> <li>• Robert Drake Primary School, Benfleet;</li> <li>• Canvey Skills Campus / Procat, Canvey Island; and</li> <li>• Cornelius Vermuyden, Canvey Island.</li> </ul>	<p>Green Belt in order to expand if necessary and allocated as education land.</p> <ul style="list-style-type: none"> <li>• King John School, Benfleet;</li> <li>• The Deanes School, Benfleet;</li> <li>• Glenwood School, Benfleet;</li> <li>• Kents Hill Infants and Junior School, Benfleet;</li> <li>• Holy Family Catholic Primary School, Benfleet;</li> <li>• Robert Drake Primary School, Benfleet;</li> <li>• Canvey Skills Campus / Procat, Canvey Island; and</li> <li>• Cornelius Vermuyden, Canvey Island.</li> </ul> <p>This would be consistent with the Main Modification 67 to the withdrawn Local Plan.</p>	<p>and has been prepared in different circumstances to the previous withdrawn plan. The new plan proposes a new housing strategy of urban intensification consequently the Green Belt becomes more significant as the Green Belt tightly bounds the existing urban areas and there is limited green space in Castle Point. As all these sites are within designated Green Belt, the Council considers that further development of these sites is not acceptable.</p>	<p>Please refer to the Statement of Common Ground.</p>
(76) GB2-Previously developed land in the Green	<p>Criteria 1a should also make reference to a site within the 'good' accessibility category of accessibility as there is quite a range between the services provided between a high and moderate accessibility category.</p>	<p>More clarity is required over the accessibility category to include "good"</p>	<p>Accepted and additional criteria added</p>	<p>Add amendment to Criteria 1a to read:</p> <p><i>The site is in a high, good or moderately</i></p>

Policy	ECC Response	Summary	CPBC officer response	Modification
Belt, Criteria 1a, Page 129				<i>accessible location as identified on the map at Appendix D, and has safe footway access, conforming to established highway regulations;</i>
(77) Policy ENV2 Coastal and Riverside Strategy , Criteria 1, Page 133	ECC welcomes reference in criteria 1 to working with ECC, as the Lead Local Flood Authority, and other partners to prepare a Riverside Strategy	Welcomes criteria to work with ECC as Lead Flood Authority and partners to prepare a Riverside Strategy	Accepted, no modifications	No Mods
(78) Policy ENV2 Coastal and Riverside Strategy , Criteria 1a, Page 133	ECC welcome reference in criteria 1a to TE2100 Plan which allows for future seawall defence maintenance and construction	Welcomes reference to the TE2100 Plan within the policy which allows for future seawall defences.	Accepted , no modifications	No Mods
(79) Policy Infra1 - Community Facilities, Criteria 3d, Page 142	ECC seek criteria 3 “d” is amended to refer to access to adequate cycling and walking links as well as public transport provision.	Recommends reference to cycling and walking links as well as provision of public transport within the policy	Accepted and amendment made.	Amend Criteria 3 d to read: <i>Be located in a sustainable location, with access to adequate <del>and within walking distance of</del> public transport provision, <u>cycling and walking links;</u></i>
(80)	ECC seek amendments to Criteria 5 to provide clarification that education (a nursery) is not defined as being	Recommends that nursery provision is not defined as being	CPBC agree early years provision should not be lost	<i>Amend Criteria 5 to read</i>

Policy	ECC Response	Summary	CPBC officer response	Modification
Policy Infra1 - Community Facilities, Criteria 5, Page 142	community use and thereby subject to Policy Infra1. Educational establishments and libraries should be protected for their existing use and any change of use only permitted if it has been identified by ECC or other educational providers as being surplus to educational requirements consistent with Policy Infra2 <i>In relation to the loss of a locally valued community facility that is commercial in nature, such as a public houses or , private healthcare facility or a nursery, evidence will need to be submitted to demonstrate that the use is not economically viable and that it is no longer required to meet the needs of the local community.</i>	community use and thereby subject to Policy Infra1.	to development unless there are other providers within the area to pick up the surplus.  Please refer to the SOCG to clarify that libraries should be included within 'community' use rather than education, as stated in the Reg 19 response..	<i>5. In relation to the loss of a locally valued community facility that is commercial in nature, <del>such as a public houses or , private healthcare facility or a nursery,</del> evidence will need to be submitted to demonstrate that the use is not economically viable and that it is no longer required to meet the needs of the local community This should include demonstrable evidence that the facility had been placed on the open market for a period of at least one year at the standard market rate, without success.</i>
(81) Policy Infra1 - Community Facilities,	ECC seek amendment to paragraph 19.7 to provide clarification that education is not defined as being community use and thereby subject to Policy Infra1. Educational establishments and libraries should be protected for their existing use and any change of use only	Education should not be defined as community use and thereby subject to Policy Infra1. Educational establishments and libraries should be protected for	CPBC agrees to amending the text so differentiate between educational buildings which are referred in INFRA2 and	Amend paragraph 19.7 to read:

Policy	ECC Response	Summary	CPBC officer response	Modification
Paragraph 19.7, Page 143	permitted if it has been identified by ECC or other educational providers as being surplus to educational requirements consistent with Policy Infra2. ECC require paragraph 19.7 is amended to delete reference to schools as community uses to read: <i>Many of the <del>schools</del>, community halls and GP surgery buildings within the Borough are ageing and have issues accommodating the services required.</i>	their existing use and change of use only permitted if ECC and other educational providers identify as being surplus to educational requirements.	community facilities under INFRA1  Please refer to the SOCG to clarify that libraries should be included within 'community' use rather than education, as stated in the Reg 19 response..	<i>19.7 Community facilities represent a considerable stock of brownfield land supply in the Borough. Many of these <del>schools</del>, <del>community halls and GP surgery</del> <u>community</u> buildings within the Borough are ageing and have issues accommodating the services required.</i>
(82) Policy Infra1 - Community Facilities, Paragraph 19.13, Page 143	ECC seek amendment to paragraph 19.13 to provide clarification that education is not defined as being community use and thereby subject to Policy Infra1. Educational establishments and libraries should be protected for their existing use and any change of use only permitted if it has been identified by ECC or other educational providers as being surplus to educational requirements consistent with Policy Infra2. ECC require the definition of community uses in paragraph 19.13 is amended to read: <i>For the purposes of this Policy, community facilities can be defined as including children's play and recreation facilities, services for young people, older people and disabled people, as well as health facilities, facilities for emergency services, including police facilities, <del>education facilities, libraries</del>, community halls, criminal justice</i>	Considers that education facilities and libraries are removed from the definition of community use in Infra1	CPBC considers that all the services listed within this policy are important including educational services. Additional text has been provided to accommodate EEC requests.  Please refer to the SOCG to clarify that libraries should be included within 'community' use rather than education, as stated in the Reg 19 response..	<i>Amend Paragraph 19.13 to read:  For the purposes of this Policy, community facilities can be defined as including children's play and recreation facilities, services for young people, older people and disabled people, as well as health facilities, facilities for emergency services, including police facilities, -libraries, community halls,</i>

Policy	ECC Response	Summary	CPBC officer response	Modification
	<i>facilities meeting rooms, places of worship, public toilets, pubs and post offices.</i>			<i>criminal justice facilities meeting rooms, places of worship, public toilets, pubs and post offices.</i>
(83) Policy Infra1 - Community Facilities, Paragraph 19.13, Page 143	ECC welcomes the reference to community halls and health centres within community facilities in paragraph 19.13 as they help contribute to healthy and inclusive communities. These facilities should be designed inclusively to ensure they are accessible and usable by all people, regardless of age, need, or disability. This is important not only for those living in Specialist and Supported Housing (SSH) but also for people with support needs living in general housing and participating in wider community life. This aligns with ECC's Extra Care Design Guide (2023) and Supported Living Accommodation Standards.	Welcomes reference to community halls and health centres are included in community facilities and any development which includes new community facilities should be designed to be accessible by all people regardless of age, need or disability.	Accepted no modification	No Mods
(84) Policy Infra1 - Community Facilities - Providing the Infrastructure Required to Support Growth, Paragraph 19.10, Page 143	ECC welcome reference in Criteria 3c and paragraph 19.10 regarding the need for accessibility of community facilities to be designed to enable accessibility for all regardless of disability, including those with care and support needs who may live in general housing and participate in wider community life. However, paragraph 19.10 does not set out how infrastructure to support SSH will be delivered, as raised in ECC's Regulation 18 response. These forms of housing require integrated infrastructure to ensure operational viability and support independence, including: <ul style="list-style-type: none"> <li>• Access to health and care services (referenced in the Infrastructure Delivery Plan, Section 11.3(g)).</li> </ul>	The delivery of Infrastructure to support Specialist and Supported Housing will need to be considered	CPBC has included reference to Specialist and Support Housing within its Infrastructure Delivery Plan and Policy Hou4. New development which provides Specialist and Supported Housing will have to consider within their design the necessary infrastructure needs to support them and provide evidence of this within their planning applications	<i>Add sentence to 19.10</i>  <i>Planning applications should provide details of how accessibility has been considered within the design of the development.</i>



Policy	ECC Response	Summary	CPBC officer response	Modification
	<ul style="list-style-type: none"> <li>Community facilities suitable for people with care and support needs (Policy Infra3 – Improving Health and Wellbeing)</li> <li>Transport and mobility infrastructure (NPPF paragraph 117b)</li> <li>Digital connectivity for care-enabled technology (ECC Market Position Statement, 2023)</li> </ul> <p>ECC recommends paragraph 19.10 is amended to include reference to infrastructure required to support Supported and Specialist Housing (SSH), including:</p> <ul style="list-style-type: none"> <li>Care-ready community facilities</li> <li>Accessible transport and mobility infrastructure</li> <li>Digital connectivity to support care-enabled technology</li> </ul> <p>ECC recommends that the Infrastructure Delivery Plan (IDP) includes specific reference to SSH-related infrastructure needs.</p>			
(85) Policy Infra2 – Education, Skills and Learning, Criteria 1, Page 144	<p>ECC seek amendments to ensure that Policy Infra1 - Community Facilities and Policy Infra2 – Education, Skills and Learning relate to the relevant uses, which at present is unclear due to definitions in the Glossary and Reasoned Justification.</p> <p>ECC support criteria 1 which states that the change or use or redevelopment of educational establishments will only be permitted if it has been identified by ECC or other educational providers, they are surplus to educational requirements. However, ECC recommends sites of educational use are identified on the Policies Map to help implement this policy.</p>	Request that educational establishments are not included in Infra1 which refers to community uses and that educational establishments are identified on the policy map and reference made to this in criteria 1.	Amendments have been made to the text to distinguish educational uses from community uses between INFRA1 and INFRA2 CPBC agrees to identifying sites of educational use on the policies map.	<p>Amend Criteria 1 amended to read:</p> <p><i>The change or use or redevelopment of educational establishments, identified on the Policies Map, will only be permitted if it has been identified by ECC or other educational providers, they are surplus to educational requirements.</i></p>

Policy	ECC Response	Summary	CPBC officer response	Modification
				Add existing educational establishments to the policies map
(86) Policy Infra2 – Education, Skills and Learning, Criteria 2, Page 144	ECC support reference in Criteria 2 where a development proposal, either individually or cumulatively, increases demand for education facilities beyond those available within the local area, development will be required to provide land for a new educational facility, expand or alter an existing facility and/or make a proportionate contribution to fund necessary improvements to education facilities. Reference to development providing land for a new educational facility, expand or alter an existing facility and/or make a proportionate contribution to fund necessary improvements to education facilities should also be referenced in Policy SP4 – see earlier response.	Development proposals which increase demand for education facilities beyond those available within the local area should contribute to expansion or alteration of the facility to provide for the additional demand	Accepted no modifications  Policy SP4, Criteria 2 has been amended to make reference to where necessary, developers being required to make direct provision or provide proportionate contributions towards the provision of infrastructure required to make a development acceptable in planning terms providing consistency with this policy	No Mods
(87) Policy Infra2 – Education, Skills and Learning, Paragraph 19.17, Page 144	ECC seek amendments to ensure that Policy Infra1 - Community Facilities and Policy Infra2 – Education, Skills and Learning relate to the relevant uses, which at present is unclear due to definitions in the Glossary and Reasoned Justification. ECC consider paragraph 19.17 defines education uses subject to the deletion of 'youth facilities', which is included in the Glossary definition of Community Uses.	Proposes the removal of “youth facilities” from the definition for Education facilities	Accepted Youth facilities removed from definition  Please refer to the SOCG to clarify that libraries should be included within 'community' use rather than education, as stated in the Reg 19 response..	Amend paragraph 19.17 to read:  <i>'...colleges, <del>libraries,</del> youth facilities, employment and skills measures and other community learning spaces'.</i>

Policy	ECC Response	Summary	CPBC officer response	Modification
(88) Policy Infra2 – Education, Skills and Learning, Paragraph 19.20, Page 144.	<p>Paragraph 19.20 refers to the Infrastructure Delivery Plan establishing where new educational facilities are required based on the growth identified within the Plan.</p> <p>However, CPBC has not requested or provided the relevant information for ECC to undertake the required cumulative assessment of the growth in the Plan consistent with Section 3.4 of the Essex County Council Local and Neighbourhood Planners' Guide to School Organisation and Place Planning (February 2025). Consequently, the references in paragraph 19.25 regarding early years requirements and paragraphs 19.27 – 30 (primary, secondary and SEND) will need to be subject to a cumulative assessment of the scale and distribution of growth set out in this Plan.</p> <p>Prior to submission of the Plan, the IDP will require a significant update to fully reflect the evidence base referenced in the Plan, as a significant amount has been undertaken since the latest IDP. ECC will need to undertake a cumulative assessment of the growth for education and early years and childcare and assist to identify the necessary highway and transportation interventions necessary.</p>	A cumulative assessment is required with respect to primary, secondary, early years education and childcare and SEND provision based on the scale and distribution of the Plan prior to submission of the Plan. This would feed into an updated Infrastructure Delivery Plan.	<p>CPBC will work with ECC to undertake a further assessment to identify the necessary primary, secondary, early years education and childcare and SEND provision for the submission Plan and the IDP and Site Policies will be updated according to the results of that assessment.</p> <p>In January 2026, ECC provided addendums to the education assessments previously undertaken in November 2025.</p>	No Mods
(89) Policy Infra2 – Education, Skills and Learning, new Criteria, Page 142	<p>ECC welcomes reference to Employment and Skills Plans (ESP) in paragraphs 19.35 and 19.36 but reference should be made within the policy to provide them with more weight through the planning application process.</p> <p>ECC, via the ECC Developers Guide to Infrastructure Contributions (2025), requires all strategic scale planning applications of 50 or more homes or employment space providing 2,500sqm (GIA) or more floorspace, to enter into an Employment and Skills Plan to provide employment and skills opportunities to benefit the local community. An ESP must:</p>	Welcomes reference to the preparation of Employment Skills Plans and for growth to improve local skills and access to employment skills and employment through Employment Skills Plans.	Accepted and additional criteria added to emphasise the Council's commitment to improve employment and skills in the borough.	<p>Add an additional Criteria be added to the policy to read:</p> <p><u>4. The Council will seek to improve local skills and access to employment opportunities through Employment and Skills Plans.</u></p>

Policy	ECC Response	Summary	CPBC officer response	Modification
	<ul style="list-style-type: none"> <li>include apprenticeships, work experience, volunteering, careers information and training;</li> <li>must be shared with and agreed by the LPA and ECC ahead of the S106 agreement being signed off;</li> <li>include options such as the direct delivery or skills and employability programmes, school / college engagement and work experience opportunities, or construction or workplace apprenticeship schemes for local residents;</li> <li>be secured through S106 agreements; and</li> <li>cover the Council's costs associated with the monitoring of the plans, with reports provided to the Council by developers for inclusion in the Authority Monitoring Report.</li> </ul>			
(90) Policy Infra3 – Improving Health and Wellbeing, Paragraph 19.44, Page 149	<p>ECC welcome and support Policy Infra3 which aims to support to improve the health and wellbeing of residents through partnership working with Health Stakeholders and Public Health.</p> <p>ECC recommend paragraph 19.44 is amended to reference the local Castle Point and Rochford Health and Wellbeing Strategy</p>	<p>Welcomes aim to improve health and wellbeing of residents through partnerships with Health Stakeholders and Public Health. Recommends reference to Castle Point and Rochford Health and Wellbeing Strategy</p>	<p>Accepted. Policy Infra 3 makes reference to the Castle Point and Rochford Health and Wellbeing Strategy</p>	<p><i>Amend 19.44 to read</i></p> <p><i>More broadly, the Council will work with the NHS, Public Health and other partners through the South East Essex Alliance and the Castle Point and Rochford Health and Wellbeing Board to address issues and priorities emerging through the Joint Strategic Needs Assessment (JSNA), and the Essex Joint Health and Wellbeing Strategy</i></p>

Policy	ECC Response	Summary	CPBC officer response	Modification
				<i>and the Castle Point and Rochford Health and Wellbeing Strategy. This will not only involve .....</i>
(91) Policy Infra3 – Improving Health and Wellbeing, Paragraph 19.44, Page 149	Typo Essex Healthy Places Document not Essex Health Places	Typo	Accepted	Amend “Health” to “Healthy” in paragraph 19.44
(92) Policy Infra4 – Open Spaces, Criteria 1, Page 150	School playing fields are not considered public open space in the same way as parks or village greens. While some schools may allow community access to their playing fields, they are primarily intended for the physical education and recreation of the students who attend the school. Government guidance on school land says that school playing fields are provided for the benefit of pupils and their enjoyment, and any community use is usually at the school's discretion. There is a strong policy presumption against the disposal or change of use of school playing field land, and the Secretary of State's prior consent is needed for any such action. ECC require school playing fields being counted as ‘open space’ be deleted from the schedule in Appendix J and the Policies Map.	School playing fields should not be considered public open space and their change of use is restricted..	Accepted. The Council agrees that school playing fields are not public open spaces.	Delete reference to school playing fields in Appendix J and on the Policies Map for open spaces
(93) Policy Infra6 - Communications Infrastructure, paragraph 19.70, Page 154	ECC welcome reference to the Essex Design Guide and in particular the EPOA Planning Guidance for Digital Connectivity (focused on fixed line Broadband connections) to guide the pre-application and planning application process for mobile (4G/5G).	Collaboration between developers, local authorities and mobile network operators will be essential to minimise the impact on the cellular network capacity from proposed growth. Welcomes	CPBC agrees that it will be important to collaborate early with digital stakeholders and developers to address communities’ digital needs	No Mods

Policy	ECC Response	Summary	CPBC officer response	Modification
	The proposed growth is likely to have a considerable impact on existing or planned cellular network capacity. It will be essential for early collaboration between developers, local planning authorities and mobile network operators (or their infrastructure partners) to identify suitable locations for new or upgraded masts that minimise impact on the local community and environment while effectively addressing connectivity needs.	reference to the Essex Design Guide and the EOPA Planning Guidance for Digital Connectivity	with minimum impact from digital structures. Noted no modifications.	
(94) Policy Infra6 - Communications Infrastructure, paragraph 19.70, Page 154/155	To be consistent with NPPF, paragraph 120 reference should be made to the potential for mast sharing wherever possible to minimise impacts, along with their sympathetic design and camouflage with the local area. ECC welcome reference to the Essex Design Guide and in particular the EPOA Planning Guidance for Digital Connectivity (focused on fixed line Broadband connections) to guide the pre-application and planning application process for mobile (4G/5G).	Recommends digital mast sharing and sympathetic designs to minimise impacts of digital infrastructure.	Accepted. CPBC agree that mast sharing and good design can minimise the impact of masts on the local area.	<i>Amend paragraph 19.70 to read</i>  <i>However, initial roll out of 5G provision has highlighted some design, layout and siting concerns that need to be addressed in future provision. <u>Use of existing masts, buildings and other structures should be encouraged.</u> Where new sites are required (such as for new 5G networks) equipment should be sympathetically designed and camouflaged where appropriate. The Essex Design Guide....</i>
(95) Paragraph 20.4, Page 156	Typo Carbon	Typo to be corrected	Accepted	Typo (Carbon) in paragraph 20.4 is amended to read:

Policy	ECC Response	Summary	CPBC officer response	Modification
				<i>The Net Zero: Making Essex Carbon Neutral report details an Avoid, Shift and Improve approach for reducing transport emissions:</i>
(96) Paragraph 20.6, 1st sentence, Page 156	Reference could be made to some of the projects in the South Essex Implementation Plan, Appendix A – Scheme List, which have emerged from a prioritisation exercise representing ideas from a snapshot in time but which are not guaranteed to be funded as part of LTP4. As funding and circumstances change so will priorities for such schemes. For example, the A13 sustainable corridor; A127/A130 Fairglens amongst others.	Reference should be made to projects within the South Essex Implementation Plan Appendix A and some of the proposed schemes	Accepted. CPBC supports schemes and initiatives that improve the highway network in South Essex particular key routes such as A13 and the A127/A130 Fairglens junction.	Reference to the potential date of adoption of the LTP4 in the 1st sentence is amended to read: <i>Winter 2025/2026</i>
(97) Policy T1 - Transport Strategy, Page 157	ECC welcome reference in paragraph 1 to CPBC working with the local Highways and Transportation Authorities and service providers to secure transport network improvements in the borough to reduce carbon emissions and be net zero by 2050. Reference to mobility hubs at Benfleet Station, Kiln Road, employment areas and town centres in Criteria 5 are welcomed in principle. Please refer to comments to Policy T5 - Highway Impact, Paragraph 20.52, Page 166 regarding the Transport Assessment and IDP. Prior to submission, the IDP will need to be updated to reflect the significant new policy guidance and evidence base, including the Transport Assessment, that has been undertaken since it was prepared early in 2025. Please refer to the response to the IDP.	Supports CPBC working with transport stakeholders to secure network improvements and reduce carbon emissions	CPBC will continue to work with Highways and Transportation Authorities and stakeholder to secure transport improvements and will provide ECC following the feedback from public consultation with an updated Transport Assessment prior to submission.	No Mods
(98) Policy T1- Transport	NPPF, paragraph 109 requires a vision led approach to identifying transport solutions. ECC welcome reference to an 'avoid, shift and improve' approach in paragraph 20.4.	Considers that there is lack of spatial vision of how sustainable transport can be improved	The Transport Strategy which supports the Castle Point Plan is based on the principles of avoid, shift	No Mods  Following ECC review of the Transport

Policy	ECC Response	Summary	CPBC officer response	Modification
Strategy, Page 157	<p>The Plan policies and area specific policies make reference to general improvements, but the Plan and Proposals Map currently lack a spatial 'big picture' vision of how sustainable transport can be improved or key corridors and junctions that should be improved (subject to funding being identified)</p> <p>Please refer to comments to Policy T5, paragraph 20.52. Prior to submission the site policies and Proposals Map should identify key necessary interventions based on the local impact on routes, junctions and identify necessary interventions.</p>		<p>and improve. This is supported by aligning its active policies to LWCIP and through its proposed feasibility work on improved access in and around Canvey Island in policy C5 and its continued support for improvements on the key junctions and highway links across South Essex</p> <p>EEC is reviewing the updated Transport Assessment, following the comments submitted as part of the Regulation 19 consultation. If the updated TA is supported by ECC its recommendations will need to be incorporated into the relevant plan policies and any updates to the IDP, where necessary.</p>	Assessment, modifications will be provided to support the Submission Plan, specific Site Policies and the updated IDP
(99) Paragraph 20:16, Page 159	Paragraph 20.16 refers to the need to improve the coverage, frequency, reliability and quality of bus services if a modal shift is to be achieved. There is no clarity on what level of modal shift is desired or how this may be achieved via specific schemes in the Schedule of Interventions (see comments to Policy T5 Highways Impact) and how it will impact highway capacity. This is important to demonstrate consistency with NPPF, paragraph 109 where LPAs are	Requires further clarity on specific schemes required to improve public transport services to support proposed growth	Bus service provision is outside of the remit of the Council but the Council aims to support improvements in coverage, frequency and quality of bus services through engagement with bus	No Mods Following ECC review of the Transport Assessment, modifications will be provided to support the Submission Plan, specific Site Policies and the updated IDP



Policy	ECC Response	Summary	CPBC officer response	Modification
	required to undertake a vision led approach to identifying transport solutions. Please refer to the response to Policy T5 and the Transport Assessment.		service providers during the master planning process of key development sites.  EEC is reviewing the updated Transport Assessment, following the comments submitted as part of the Regulation 19 consultation. If the updated TA is supported by ECC its recommendations will need to be incorporated into the relevant plan policies and any updates to the IDP, where necessary	
(100) Paragraph 20:28, Page 161	Work is programmed to commence the permitted short-term A127 / A130 Fairglen Interchange (short term) improvements in 2025 and will cover a two-year construction period.	Comments that work on short term improvements to Fairglen Interchange are scheduled in 2025	Noted and text updated	Paragraph 20.28, final sentence to be amended to read:  <i>Work on initial improvements to the Fairglen Interchange (<del>short term</del>) is expected to commence in <del>the</del> <del>course</del> 2025.</i>
(101) Policy T3 - Active Travel Improvements, Paragraph 20.33, Page 162	Criteria 1 requires new development to be designed to prioritise and maximise opportunities for safe and convenient active travel routes supporting healthy and active lifestyles. This must include accessibility to and accessing SSH schemes.	Requests the addition the recommendations of the SSHANA for the design of active travel improvements.	The proposed wording requires developers to provide active travel routes with high accessible specifications, which might not be possible due to site	<i>Paragraph 20.33 will be amended to read:</i>  <i>As Castle Point has a population that is older than average, <del>this wider</del></i>

Policy	ECC Response	Summary	CPBC officer response	Modification
	<p>ECC welcome the recognition in paragraph 20.33 of mobility needs for older and disabled residents, including the use of mobility scooters and wheelchairs. This aligns with ECC's Market Position Statement and the Extra Care Design Guide, which emphasise the importance of accessible transport in enabling independence and reducing isolation. Necessary measures may include but will be determined on a case-by-case basis:</p> <ul style="list-style-type: none"> <li>• Drop-off zones for care providers and residents with limited mobility – required under Building Regulations Part M4(3) and ECC Supported Living Accommodation Standards (2023)</li> <li>• Accessible pedestrian infrastructure (e.g. dropped kerbs, level surfaces) – consistent with NPPF paragraph 117 a and c requiring developments to be accessible by sustainable transport</li> <li>• Public transport connectivity to health and community services – referenced in the ECC Planning with Care Guidance (2025) and Essex Local Transport Plan (LTP4)</li> <li>• Parking standards aligned with M4(3) requirements – consistent with the Essex Parking Guidance (2024) and ECC's Developers' Guide to Infrastructure Contributions (2025), Appendix J.</li> </ul> <p>These measures align with NPPF, 115b, which requires planning policies to provide safe and suitable access to the site for all users and to essential services and sustainable transport and 135f to create places that are safe, inclusive and accessible and which promote health and well-being and</p> <p>ECC require reference is provided in paragraph 20.33 to transport infrastructure required to support SSH, including</p>		specifications on some travel route developments.	<p><del>definition</del> it is important <del>in ensuring</del> that active travel infrastructure supports the whole community, including those who are less able, and are at risk of social isolation. <u>Development proposals should have regard to the ECC Extra Care Design Guide principles to ensure opportunities for accessible and inclusive design are taken, enabling people to age well in place and reflecting the needs of different cultures, genders and disabilities.</u></p>

Policy	ECC Response	Summary	CPBC officer response	Modification
	drop-off zones for care providers and residents with limited mobility; accessible pedestrian routes (e.g. dropped kerbs, level surfaces); parking standards are aligned with M4(3) accessibility requirements and public transport connectivity to health and community services.			
(102) Policy T3 - Active Travel Improvements, Criteria 3, Page 162	ECC supports the principles of the Policy, namely, prioritising and maximising safe and convenient and multifunctional active travel routes; making appropriate and proportionate financial contributions towards active travel improvements; and securing highways works via S278 agreements and/or financial contributions (S106). However, Criteria 3 only refers to developments being required to make appropriate and proportionate financial contributions towards active travel improvements taking into account requirements of the Infrastructure Delivery Plan. ECC has recommended the deletion of Criteria 1 in Policy SP4, as it implies that contributions will only be made if the site is linked to an infrastructure item listed in the IDP. The IDP is a 'living document' and will change over time as more information is known. The purpose of the policy should be to ensure that all sites (including windfalls) make an appropriate contribution towards the necessary infrastructure consistent with the statutory tests in regulation 122 (as amended by the 2011 and 2019 Regulations), namely necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.	Supports the provision of developer contributions for providing active transport routes but requires that these are linked to the needs of the development and not just those that have been identified within the Infrastructure Delivery Plan, which is likely to change over time.	The CPBC agrees that developer contributions for active travel should be appropriate and proportionate to the development taking account of the Infrastructure Delivery Plan.	Amend Criteria 3 to read: <i>Developments will be required to make appropriate and proportionate financial contributions towards active travel improvements within the Borough taking into account requirements of the Infrastructure Delivery Plan.</i>
(103) Policy T3 - Active Travel	Paragraph 20.34 refers to the Transport Assessment identifying an 'Initial Schedule of Interventions' including a series of potential improvements to local walking and cycling networks. This schedule was updated to reflect the	Essex Highways require to review the final Transport Assessment including the Canvey Addendum with clarification over the	CPBC have updated the Plan's Transport Assessment following public consultation and will	No Mods  Following ECC review of the Transport

Policy	ECC Response	Summary	CPBC officer response	Modification
Improvements, Paragraph 20.34	<p>outcome of the transport modelling for this Plan. ECC was not provided with an opportunity to comprehensively review the completed TA (including its Appendices) and the West Canvey Addendum (August 2025), with the latter published post commencement of the consultation. Essex Highways has reviewed the TA and the detailed report (including Appendices) is set out as Appendix 5. However, it is not expected that the overall conclusions of the TA and the Addendum will change but further work is necessary to ensure the modelling approach is robust for examination and scrutiny by other parties. Some high level concerns regarding the Transport Assessment include the following with regards the 'Schedule of Interventions' Further clarification is necessary as to whether the Schedule of Interventions (a list of potential schemes/projects which could improve the various modes of transport) are general proposals or tailored to specific development sites; specific interventions require further evidence as to why they have been selected, how they will achieve modal shift, will influence highway capacity at the current congestion hotspots (paragraph 20.19) which are likely to worsen as a consequence of growth, should be prioritised, link to the Plan and could form packages of measures to inform the IDP.</p> <p>ECC require further clarification with regards how the 'Schedule of Interventions' have informed the Plan and can be incorporated into the next iteration of the IDP to support the Submission Plan and its policies</p>	proposed schedule of interventions and schemes to support growth and how they have been selected.	<p>provide this for Essex Highways to review.</p> <p>EEC is reviewing the updated Transport Assessment, following the comments submitted as part of the Regulation 19 consultation. If the updated TA is supported by ECC its recommendations will need to be incorporated into the relevant plan policies and any updates to the IDP, where necessary</p>	Assessment, modifications will be provided to support the Submission Plan, specific Site Policies and the updated IDP
(104) Policy T5 - Highway Impact,	Paragraph 20.52 refers to the transport modelling undertaken for the Plan indicating that there are several junctions in the borough which are close to or are operating at or over capacity currently, these junctions will worsen if	The Plan referred to a number of Highway Junctions operating at capacity. ECC were satisfied with the Transport Assessment Scoping	CPBC has undertaken additional work to the Transport Assessment which will be sent to ECC	<p>No Mods</p> <p>Following ECC review of the Transport</p>

Policy	ECC Response	Summary	CPBC officer response	Modification
Paragraph 20.52, Page 166	<p>they are not mitigated, and where a junction is operating in excess of its designed capacity any additional exceedance is likely to have a severe impact on the transport network and need to be mitigated for development to go ahead. ECC has held regular meetings with CPBC and its consultants Systra to assess the expected transport impacts associated with the Plan growth. ECC contributed to and was satisfied that the Transport Assessment Scoping Report provided an appropriate piece of evidence to support the Regulation 18 Consultation (Issues and Options – July – September 2024). However, ECC was not provided with an opportunity to comprehensively review the completed TA (including its Appendices); the West Canvey Addendum (August 2025 - published post commencement of the consultation) and the Green Belt Site Assessment (with regards transport matters) in advance of the public consultation.</p> <p>Consequently, ECC instructed Essex Highways to undertake a full review of these documents and its response can be viewed in Appendix 5. It is not expected that the overall conclusions of the TA and the Addendum will change but further work is necessary to ensure the modelling approach is robust for examination and scrutiny by other parties. The key issues which are considered to be significant and likely to have a large impact on the analysis and findings of the TA are set out below:</p> <p>Transport Assessment</p> <ul style="list-style-type: none"> <li>all junctions considered ‘in-scope’ of assessment should be modelled with forecast traffic flows to enable identification of where developer-funded mitigation is required, even if the mitigation measures are not yet fully defined in the Plan.</li> <li>justification is required explaining why junction modelling of the key strategic junctions of Fairglen</li> </ul>	<p>Report but had not had sight of completed Transport Assessment with the West Canvey Addendum and The Green Belt Assessment with regards Transport matters. It is not considered that the conclusions would change but further modelling would be required and any necessary amendments to be incorporated into the plan prior to submission.</p> <p>EEC also consider that the methodology for the multicriteria assessment of Green Belt Sites is not clear or robust, in particular the evidence and weight given to transport criteria for “severe “ impact and “significant” impact on transport networks. EEC queries why some sites which were put forward in the previous withdrawn plan but are no longer considered acceptable for the Castle Point Plan.</p>	<p>to be reviewed prior to submission of the Plan.</p> <p>EEC is reviewing the updated Transport Assessment, following the comments submitted as part of the Regulation 19 consultation.</p> <p>The methodology for multicriteria assessment of Green Belt Sites can be found in the Housing Topic Paper 2025. CPBC considers its assessment of transport issues relating to proposed sites has been consistent and robust.</p> <p>The Castle Point Plan is a new plan which has been drawn up some 6 years after the withdrawn plan and consequently supported by new UpToDate evidence.</p>	<p>Assessment, modifications will be provided to support the Submission Plan, specific Site Policies and the updated IDP</p>

Policy	ECC Response	Summary	CPBC officer response	Modification
	<p>Interchange, Sadlers Farm and Rayleigh Weir has not been undertaken.</p> <ul style="list-style-type: none"> <li>• further assessment is required to evidence the potential cross boundary impacts on neighbouring authorities, in particular with regards the A13, A127, A130 and larger B roads.</li> <li>• the Schedule of Interventions (a list of potential schemes/projects which could improve the various modes of transport) require further evidence as to why they have been selected, how they will achieve modal shift, be prioritised, link to the Plan sites and could form packages of measures to inform the IDP.</li> </ul> <p>Green Belt Site Assessment</p> <ul style="list-style-type: none"> <li>• clarification is required regarding the methodology of the multi-criteria assessment and some of the site conclusions. Further modelling work will be required when considering these sites further.</li> </ul> <p>ECC has some concerns regarding the robustness and transparency of the evidence to justify the significant shortfall of 5,500 homes. For example, the Green Belt Sites Assessment concludes that only a limited number of Green Belt sites may be suitable for further consideration, but none are allocated. It is unclear what 'weight' has been given to the assessment of these sites with regards highway matters, namely:</p> <ul style="list-style-type: none"> <li>• how circumstances have substantially changed on several Green Belt sites which were allocated by CPBC in the withdrawn Plan (2022), and following scrutiny at examination found to be suitable for development by the Inspector in his report, with regards their impact on highway capacity, opportunities to enhance active and sustainable</li> </ul>			

Policy	ECC Response	Summary	CPBC officer response	Modification
	<p>travel measures, and issues regarding site access (namely partly via residential routes).</p> <ul style="list-style-type: none"> <li>the inconsistent reference to the 'severe' impact of growth on the highway network – the TA refers to 'significant impact' and parts of the Plan refers to 'severe' with regards the general performance of the network and at specific locations. It is unclear what 'weight' has been given to the impact on the highway network in determining the deliverability of sites identified in the Green Belt Site Assessment. A number of recent appeals have been allowed despite junctions modelled as being operating at or close to capacity. The impact was not considered severe by Inspectors with respect to NPPF e.g. APP/F2360/W/22/3295498 for housing at Penwortham, Preston. CPBC will need to be satisfied that their approach to severity is defensible at examination.</li> </ul>			
(105) Policy T5 - Highway Impact, paragraph 20.55, Page 166	<p>ECC welcome reference in criteria 1 to developers being required to prepare a Transport Assessment or Transport Statement, and a Travel Plan, having regard to the thresholds published by the local Highway and Transportation Authority.</p> <p>However, ECC seek clarification to paragraph 20.55 which implies that all development, irrespective of scale, that generate significant movements will be required to produce a Travel Plan. As set out in the Developers' Guide (September 2025) developments comprising of 80 or more dwellings are required to prepare a Travel Plan setting out information set out in paragraph 20.55. Smaller developments may require a Travel Plan, if there are</p>	<p>Supports the requirement for all development which are likely to impact the transport networks to provide Transport Assessments/Statements and a Travel Plan</p>	<p>Accepted. CPBC agrees that any development which impacts the transport network should prepare transport assessments and travel plans to assess their impacts.</p>	<p>Amend paragraph 20.55 to read:  <del>All Developments that generate significant amounts of movement may</del> <u>will</u> be required to produce a Travel Plan having regard to the thresholds in Essex County Council published guidance.</p>

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	concerns around pollution, congestion, and pressures on the existing road network.			
(106) Policy T6 - Safe Access, paragraph 20.59, Page 167	<p>Reference should be made to development being required to 'have regard to' the 'School Design Guidance (May 2025)' in the Essex Design Guide. This provides guidance on safe access to schools and around their frontage and in particular:</p> <ul style="list-style-type: none"> <li>• Principle 2: New School Sites Should Be Well Connected to Local Facilities, Public Transport, Pedestrian and Cycle Routes.</li> <li>• Principle 7: The Car Free School Public Space and Associated Parking Arrangements.</li> </ul>	Requires that development involving schools should have regard to the School Design Guidance (May 2025)	Accepted and text amended	<p>Amend paragraph 20.59 to read:</p> <p><u>Development should have regard to the 'Schools Design Guidance (May 2025)' which provides guidance on school designs which are well-integrated into the community, with connections to pedestrian, cycle, and public transport networks, encouraging active travel and reducing car dependence. This integration supports the creation of vibrant, inclusive public spaces designed to enhance social interaction and community cohesion.</u></p>
(107) Policy T7- Parking Standards, Criteria 1, Page 168	ECC welcomes reference to the Essex Parking Guidance prepared by EPOA in Criteria 1. However, reference to Part 1 and 2 should be removed from the policy, which is clarified within paragraph 20.63. This is to avoid any confusion in policy terms given that Part 2	Welcomes reference to the Essex Parking Guidance. Clarification required in text over the references to Part 1 and Part 2 of the Parking Guidance as Part 2	Accepted and text amended	Amend Criteria 1 to read <i>Proposals for development will be required to make provision for all users</i>



Policy	ECC Response	Summary	CPBC officer response	Modification
	of the Guidance refers to sites of 1,000 homes or more, of which West Canvey is relevant.	refers to development over 1000+ dwellings		<i>having regard to the Essex Parking Guidance (Part 1 and 2) <u>prepared by EPOA.</u></i>
(108) Policy T7 - Parking Provision, Criteria 3, Page 168	ECC seek an amendment to Criteria 3 to insert the requirement to ' <i>have regard to</i> ' the Essex Parking Guidance prepared by EPOA	Require that development proposals will have regard to the Essex Parking Guidance	Accepted and text amended	Amend Criteria 3 to read: <i>Proposals for development will be required to <u>have regard</u> to the Electric Vehicle Charging Standards set out in the Essex <del>EPOA</del> Parking Guidance prepared by EPOA.</i>
(109) Paragraph 20.63, Page 168	ECC seek an amendment to paragraph 20.63 to refer to the Essex Parking Guidance (2024) prepared by EPOA and clarification given to large scale development comprising of 1,000 homes or more.	Request correction that it is Essex Parking Guidance and not Essex Parking Standard and clarification that large scale development represents 1,000 homes or more.	Accepted and text amended	Amend paragraph 20.63 to read: <i>The Essex Planning Officers Association's (EPOA) Essex Parking <u>Guidance</u> <del>Standard</del> (2024) were prepared with both the above balancing act in mind, and the need to move towards a net zero transport network. `.....and Part 2 – for Garden Communities and Large-Scale Developments (including a 'Connectivity Tool'), <u>where large is</u></i>

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				<i>considered 1,000 homes or more.'</i>
(110) Policy T8- Access for servicing, criteria 1 and reasoned justification	ECC support Policy T8 and criteria 1 requiring development proposals to be regularly serviced. The regularity of servicing requirements should be set out in the Freight Management Strategy on a case-by-case basis. ECC seek further clarification be provided into the reasoned justification defining what is meant by 'regular servicing'?	Provide clarity on what is meant by regular servicing of HGV vehicles with reference to access to servicing on transport routes.	Regular servicing management would be dependent on the type of freight and industry and would be considered on a case-by-case basis.	No Mods
(111) Paragraph 20.69, Page 169	Further clarification should be provided that the ECC Development Management Policies are located on the ECC website under highways planning advice.	Provide link to ECC Development Management Policies Highways Planning Advice which are located on the ECC website. This provides advice on specific requirements for developments which are likely to be regularly accessed by HGVs.	Accepted and text amended with link to information	Amend paragraph 20.69 to read: <i>The ECC <del>Essex Local Transport Plan</del> Development Management Policies sets out within its <u>highways planning advice</u> specific requirements for developments that are likely to be regularly accessed by HGVs at policy DM19.</i>
(112) Paragraph 20:71, Page 169	Whilst the requirements for waste collection vehicles are acknowledged in paragraph 20.71 and design of streets should be consistent with the Essex Design Guide – Highways Technical Manual which provides the full understanding of the relevant design principles for new residential developments. Refuse-collection vehicles will circulate on all parts of the adopted road system but not on private drives. In the case of mews court cul-de-sac, they will enter in reverse gear and not turn. Refuse collection will be made only from	Reference should be made to Essex Design Guide- Highways Technical Manual to ensure streets are designed to accommodate waste collection vehicles	Noted and additional text with reference to Design Guide Highways Technical Manual Added	Add additional sentence to paragraph  <i><u>Design Guidance on Street Design with respect to waste collection can be found in the Essex Design Guide- Highways Technical Manual.</u></i>

Policy	ECC Response	Summary	CPBC officer response	Modification
	those dwellings within 25m of an adopted road local operatives may have different criteria. In other cases, it is necessary to provide a shared bin-collection point screened by an above-eye-level wall. This should be located within 25m of an adopted road.			
(113) Policy SD1 – Tidal Flood Risk Management, Criteria 1b, Page 170	The refusal of new bungalows or other self-contained ground floor residential accommodation (without appropriate refuge) in Criteria 1b is welcomed	Welcomes the restriction on new bungalows or ground floor residential accommodation on Canvey Island due to tidal flood risk.	Noted	No Mods
(114) Policy SD1 – Tidal Flood Risk Management, Criteria 4, Page 170	ECC welcome reference in criteria 4 to a 19m wide buffer of land adjacent to the existing flood defences on Canvey Island, as shown on the Policies Map, to safeguarded for future flood defence works, landscaping, environmental enhancements and amenity.	Welcomes 19m wide land buffer to existing flood defences on Canvey Island is safeguarded should any future flood defence work required.	Noted	No Mods
(115) Policy SD1 – Tidal Flood Risk Management, Criteria 6, Page 170	ECC seek criteria 6 requires new development to also be in accordance with Policy ENV2 – Coastal & Riverside Strategy to ensure the wider environment and issues are considered regarding any development proposals.	Additional text to align policy with ENV 2 to ensure that Habitat sites are not adversely impacted in accordance with ENV2	Accepted and text amended.	Amend Criteria 6 to read: <i>Development proposals must ensure that habitats sites are not adversely effected <u>and be in accordance with Policy ENV2 – Coastal &amp; Riverside Strategy</u></i>
(116) Policy SD2 - Non-Tidal Flood Risk Management,	To ensure consistency with Policy SD3, criteria 2 reference should be made to a drainage strategy being required where development is located within an area at risk of fluvial or surface water flooding, or is within a Critical Drainage Area.	Additional text stating that a drainage strategy should be required within areas at risk of fluvial or surface water flooding or within a Critical Drainage Area	Accepted and text amended	Amend Criteria 6 to read: <i>Where a development proposal is for a site in an area at risk of fluvial</i>

Policy	ECC Response	Summary	CPBC officer response	Modification
Criteria 6, Page 174	NPPF paragraph 182 states that where surface water flooding is a known issue, which includes Critical Drainage Areas, policies should encourage development to provide multifunctional benefits wherever possible, through facilitating improvements in water quality and biodiversity, as well as benefits for amenity in collaboration with the Lead Local Flood Authority, namely ECC. This approach supports betterment by turning flood risk mitigation into an opportunity for placemaking, green infrastructure and community resilience. This will be influenced by the preparation of a drainage strategy which should comply with the Sustainable Drainage Systems Guide for Essex.			<i>or surface water flooding, or is within a Critical Drainage Area, <u>a drainage strategy will be required to demonstrate how both on and off-site flood risk will be managed, and mitigation measures should be satisfactorily integrated into the design and layout of the development to provide betterment to the community by reducing flood risk.</u> Any natural or semi-natural water features such as ditches, dykes and ponds must be retained in their natural or semi-natural form to maintain existing attenuation provision and existing flow paths.</i> .
(117) Policy SD2 - Non-Tidal Flood Risk Management, Paragraph 21.28, Page 175	NPPF paragraph 182 states that where surface water flooding is a known issue, which includes Critical Drainage Areas, policies should encourage development to provide multifunctional benefits wherever possible, through facilitating improvements in water quality and biodiversity, as well as benefits for amenity in collaboration with the Lead Local Flood Authority, namely ECC. This approach	Development in areas of surface water flooding should provide a drainage strategy which designs in multifunctional benefits including improvements in water quality biodiversity and amenity.	Accepted and text amended	Amend paragraph 21.28 to read: <i>ECC is the Lead Local Flood Authority (LLFA) and are responsible for surface water flooding. ECC's Interactive Flood</i>

Policy	ECC Response	Summary	CPBC officer response	Modification
	supports betterment by turning flood risk mitigation into an opportunity for placemaking, green infrastructure and community resilience. This will be influenced by the preparation of a drainage strategy which should comply with the Sustainable Drainage Systems Guide for Essex.			<p><i>and Water Management Map identifies Critical Drainage Areas (CDAs), these are areas, where multiple or interlinked sources of flood risk cause flooding during a severe rainfall event affecting people, property or infrastructure. <u>Where a development proposal is within a CDA, a drainage strategy will be required to demonstrate how surface water flooding on site will be managed and how the site will mitigate the risk of increasing flooding downstream. Drainage strategies should comply with the Sustainable Drainage Systems Guide for Essex.</u></i></p> <p><i><u>In particular, sites within a CDA should ensure areas of hardstanding are permeable, consider rainwater harvesting, as well as discharging surface water at the</u></i></p>

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				<u>lin1 year greenfield rate for all events up to the lin100 event plus climate change. Sites should follow the drainage hierarchy and utilise above grounds SuDS where possible, including SuDS for conveyance and they should be included in the landscape strategy. There are seven identified CDAs in Castle Point covering Most of the Borough's land area. There are as follows:</u>
(118) Policy SD4 – Net Zero Carbon Development (In Operation), Part A, paragraph 1, Page 179	<p>ECC welcomes the inclusion of Policy SD4 which is based on the EPOA Planning Policy Statement – Operational Energy and Carbon (Net Zero), October 2025, which is based on strong evidence available on the Essex Design Guide.</p> <p>ECC does not support the recommendation of the Sustainability Appraisal (page 611), which states that the cost implications may be significant in comparison to other Development Management policy requirements and design improvements, and potentially significant enough affect viability in some circumstances. The policies are modelled on what would be most feasible for all major building typologies currently brought forward in Essex, which have all been found to be deliverable at minimal cost uplift by the Net Zero Carbon Viability and Toolkit Study that forms part of the Essex evidence base.</p>	<p>Update the policy to be consistent with the latest model policy draft within the EPOA Planning Policy Statement-Operational Energy and Carbon (Net Zero) (October 2025), which has been enhanced following successful incorporation into recent Local Plans.</p> <p>Requests that the cost implications and impact on viability within the Sustainability Appraisal are reviewed to reflect the evidence from the Net Zero Carbon Viability and Toolkit</p>	Accepted and text amended to reflect the recent EPOA Planning Policy Statement Operational Energy and Carbon (Net Zero) (October 2025) and the evidence base Net Zero Carbon Viability and Toolkit Study	<p><i>Amend Policy to read</i></p> <p><i>All new buildings must be designed and built to be Net Zero Energy and Carbon in operation <del>at occupation or, in exceptional circumstances, have an agreed strategy to achieve net zero within five years of occupation.</del> They must be ultra-low energy buildings, fossil fuel free, and generate renewable energy on-</i></p>

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	<p>As these policy standards are deliverable now, it is recommended that the added stipulation in Part A, paragraph 1 that <i>‘in exceptional circumstances, have an agreed strategy to achieve net zero within five years of occupation’</i> be removed. This is not found in the EPOA Planning Policy Statement and would add unnecessary burden on Planning Officers, who will have to follow up on non-compliant developments to ensure that they achieve net zero in operation within the five-year window.</p> <p>Achieving net zero in operation during the post-occupancy phase after building completion would also be tantamount to retrofit. It is acknowledged within this Plan that <i>‘retrofitting buildings is more disruptive, costly and time consuming than designing buildings to be net zero carbon in the first place.’</i> (p. 181). To avoid such disruption for residents, this option to achieve the policy within five years should be removed</p> <p>It should be noted that there are already elements of flexibility within the EPOA Planning Policy Statement, without the need for this five-year extension. For example, there is the option to pay into an offsetting fund should the renewable energy demands of Requirement 4 not be met.</p> <p>The EPOA Planning Policy Statement will be further updated in Autumn 2025 and these revisions will also provide more flexibility. The latest version is attached in Appendix 2. These changes are explained in greater detail in the comment for ‘p. 179-180, Policy SD4 – Net Zero Carbon Development (In Operation)’ and it is encouraged that they be incorporated into Policy SD4.</p> <p>With these provisions for flexibility and the evidence that all the most prevalent typologies are deliverable to these standards now, non-compliant developments should not be given a five-year window to meet the policy. This degree of leniency is not expedient, considering the urgency of the</p>	study which states interventions provide minimal cost uplift.		<i>site to at least match predicted annual energy use</i>

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	<p>climate crisis and local targets. It will ultimately delay the realisation of goals set by the Essex Climate Action Commission (ECAC), in its Net Zero: Making Essex Carbon Neutral Report (2021), that ‘<i>All new homes and all new commercial buildings granted planning permissions to be carbon zero by 2025</i>’ and ‘<i>All new homes and non-domestic buildings granted planning permission to be carbon positive by 2030.</i>’</p> <p>ECC seeks the policy is updated to be consistent with the latest model policy draft, which has been enhanced following successful incorporation into recent Local Plans, which have been adopted (Tendring Colchester Borders Garden Community DPD) and been examined at examination to the satisfaction of the Inspector (Uttlesford Local Plan). The updated Policy has been provided to CPBC as part of this response in Appendix 2 ahead of its formal adoption and publishing on the Essex Design Guide in Autumn 2025</p>			
(119) Policy SD4 – Net Zero Carbon Development (In	<p>The updates to the EPOA Planning Policy Statement are being made for the following reasons. The technical evidence (Essex Net Zero Policy Study 2023) demonstrates that most residential typologies can achieve the standards set in the policy and generate sufficient renewable energy through rooftop solar PV on the basis of each individual home / building. This ensures that all residents have a home that meets the same standards and delivers the same benefits (e.g. healthy, energy efficient homes with low energy bills which are more resilient to a changing climate).</p> <p>The only exception where a residential typology will find it difficult to achieve all the policy requirements is the high-rise block of flats, as they would be unlikely to generate</p>	<p>ECC welcome the embedding of the Essex model policies for net zero in the Plan. These will require to be updated by the latest policy position to be published in the Autumn 2025.</p> <p>To align with recent evidence additional criteria should be added that on large sites energy use intensity can be represented as a site wide residential average to provide flexibility.</p>	Accepted and text amended	<p>Insert additional clause under Requirement 3b - New</p> <p><i>On larger sites in exceptional circumstances this may be met on each individual phase as a site-wide residential average (weighted by floor area) provided that no single dwelling has an EUI greater than 45 kWh/m2 GIA/yr.</i></p>



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	<p>sufficient renewable energy to meet policy Requirement 4. In those cases, the energy offsetting mechanism may justifiably be triggered and used to achieve policy compliance. Bungalows have a slightly more relaxed standard for space heating in recognition of their less efficient form.</p> <p>In the Uttlesford Local Plan (June/July 2025) examination, an exceptional circumstances clause was included in their equivalent policy to Policy SD4 which allowed larger residential schemes to achieve the energy use intensity target on a site average basis. ECC commissioned further evidence to explore the implications of the exceptions clause (See pages 28-40 Appendix 4, ECC Hearing Statement to Matter 4, Issue 1, Climate for Uttlesford Local Plan Examination). The conclusion was that the clause enabled the flexibility that developers desired but it had significant negative impacts unless some modifications were made. The evidence report advised on options that would modify the clause that would still allow flexibility but guard against the worst impacts.</p> <p>Therefore, the Climate and Planning Unit at ECC advise that it would be pragmatic to include such a clause (with the recommended modifications) as it brings the ‘flexibility’ which is welcomed by Inspectors and Industry. Another amendment to Policy SD4 should clarify what ‘maximised’ means as part of Requirement 4. The renewable energy requirement clause is also proposed to be simplified so that it just relates to achieving energy balance on-site (including offsetting where this is justifiably triggered) and does not go beyond this (unless a developer wishes to).</p> <p>ECC welcome the embedding of the Essex model policies for net zero in the Plan. These will require to be updated by</p>	Request that renewable energy must be generated on site by roof top solar PV energy on all development		<p>Amend Requirement 4, Paragraph 1 of Policy SD4 to read:</p> <p><i>Renewable energy must be generated on-site for all new developments by rooftop solar PV energy (electricity) generation and the amount of energy generated in a year should match or exceed the predicted annual energy use of the building, i.e. Renewable energy generation (kWh/m2/year) = or &gt; predicted annual energy use (kWh/m2/year)*</i></p>

Policy	ECC Response	Summary	CPBC officer response	Modification
	the latest policy position to be published in the Autumn 2025.			
(120) Policy SD4 – Net Zero Carbon Development (In Operation), Part B, Title, Page 179	Typo There is a typo in Part B) Extensions and Conversations’. Amend to read ‘Conversions’	Typo	Accepted and typo corrected	Correct typo in Part B) Extensions and Conversations’. Amend to read ‘Conversions’
(121) Paragraph 21.41, Page 181	ECC seek paragraph 21.41 is updated to provide a link to the most up-to-date evidence base and implementation guidance documents. This will ensure the longevity of the references in the Plan.	Provide links to most up-to-date evidence guidance on the Essex Design Guide Net Zero Evidence Base	Accepted and link updated	
(122) Policy SD5 – Net Zero Carbon Development (Embodied Carbon), Page 180	ECC welcomes the inclusion of Policy SD5, which is based on Policy NZ2 in the EPOA Planning Policy Position for Net Zero Homes and Buildings in Greater Essex. Policy NZ2 was a ‘placeholder policy for consultation purposes’ until an Essex specific planning policy position for embodied carbon was prepared. The technical evidence to support an Essex specific embodied carbon policy was published in June 2024 (Essex Embodied Carbon Policy Study – available on the Essex Design Guide), and the EPOA Planning Policy Statement – Embodied Carbon and Circular Economy, October 2025 has recently been made available (see Appendix 3) and is likely to be finalised by the Autumn 2025. The EPOA Planning Policy Statement <i>Embodied Carbon and Circular Economy</i> is recommended to form the basis for SD5. This will ensure that SD5 is supported and justified by the technical evidence established for Greater	New evidence EPOA Planning Statement- Embodied Carbon and Circular Economy October 2025. Policy SP5 should be updated to “Embodied Carbon and Circular Economy” reflect this new evidence.	Accepted and policy title updated	Amend title of Policy SD5 to read  <i>Embodied Carbon and Circular Economy</i>

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	Essex and also ensure SD5 is consistent with planning policies being developed across Greater Essex.			
(123) Paragraph 21.40, 2nd sentence, Page 181	ECC seek an amendment to read: <i>'..... was recommended by the Essex Climate Action Commission (ECAC) in July 2024.</i>	Update evidence date to 2024	Text already states July 2024	No mods
(124) Paragraph 21.41, 1st sentence, Page 181	Reference should be made to evidence base for Policy SD4 being located and updated on the Essex Design Guide.	Reference Essex Design Guide in Policy SD4	Accepted and text amended	Amend paragraph 21.41 to read:  <i>Evidence commissioned by the <u>Climate and Planning Unit of Essex County Council on behalf of all the Greater Essex local authorities to demonstrate that building to the net zero carbon (in operation) standard set out in Policy SD4 is published and updated where necessary on the Essex Design Guide) ECAC demonstrates that building to the net zero carbon (in operation) standard set out in Policy NZ1 is:</u></i> <ul style="list-style-type: none"> <li>• Technically feasible (Report 1: Essex Net Zero Policy – Technical Evidence Base by</li> </ul>

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				<p><i>Introba, Etude, Currie &amp; Brown, July 2023 and Report 2: Essex Net Zero Policy – Policy Summary, Evidence, and Validation Requirements by Introba, Etude, Currie &amp; Brown July 2023);</i></p> <ul style="list-style-type: none"> <li>• <i>Financially viable (Net Zero Carbon Viability Study for Essex by Three Dragons, August 2022); and <u>the Net Zero Carbon Viability and Toolkit Study. Essex Climate Action Commission October 2025)</u></i></li> <li>• <i>Legally justified (Essex Open Legal Advice – Energy policy and Building Regulations by Estelle Dehon KC, Cornerstone</i></li> </ul>

Policy	ECC Response	Summary	CPBC officer response	Modification
				<i>Barristers, April 2023).</i>
(125) Paragraph 21.43, Page 181	Paragraph 21.43 should be revised to state that the EPOA Embodied Carbon Embodied Policy Study has fed into this new EPOA Planning Policy Statement – Embodied Carbon and Circular Economy (October 2025) which sets out policy SD5. It should be made clear that this is the document to refer to when interpreting policy for SD5.	Clarify that the EPOA Embodied Carbon Policy Study fed into the EPOA Planning Policy Statement – Embodied Carbon and Circular Economy (October 2025)	Accepted and text amended	<i>Amend 21.43 to read</i>  The outcomes of this work have fed into the <u>EPOA Planning Policy Statement – <del>Position – Operational Energy and Carbon (Net Zero) and EPOA Planning Policy Statement – Embodied Carbon and Circular Economy.</del> These documents set out the Essex-wide model policies upon which policies SD4 and SD5 are based and the documents provide an explanation of each of the different policy requirements in detail: for Net Zero Carbon Homes and Buildings in Greater Essex document. This sets out policies SD4 and SD5 and provides an explanation of each of the different policy requirements in detail. This should be</u>

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				<del>referred to when interpreting this policy. These documents should be referred to when interpreting policies SD4 and SD5 respectively.</del>
126) Policy SD9 – Water Supply and Waste Water, Page 187	<p>Essex is a seriously water stressed area and it is important to maximise water efficiency in all new residential and non-residential development consistent with standards evidenced through a Water Cycle Study and the water industry.</p> <p>The Shared Standards in Water Efficiency for Local Plans (June 2025) is part of a joint initiative by Natural England, the Environment Agency, and water companies (Anglian Water, Cambridge Water, Essex and Suffolk Water and Affinity Water) endorsed by Water Resources East to support Local Planning Authorities (LPAs) to deliver sustainable growth. The Shared Standards provide advice and evidence to LPAs on how they can secure higher water efficiency standards for new homes and commercial developments.</p> <p>Suggested model policy wording is provided under the heading ‘Draft policy: Water Resources and Sustainable Growth’ (page 7). It is sought that these recommended policies be reviewed for potential inclusion in Policy SD9 to ensure it is more robust.</p>	<p>Essex is a water stressed area, recommends a water cycle study.</p> <p>Recommends that that the model policies in the Shared Standards in Water Efficiency for Local Plans be reviewed and incorporated in Policy SD9, as appropriate.</p>	CPBC has integrated the Shared Standard in Water Efficiency into SD9. These standards are supported by the research by Water Resources East, which also covers South Essex	Shared water standards incorporated into SD9
(127) Policy SD9 – Water Supply and Waste Water, Page 187	<p>Essex is a seriously water stressed area and it is important to maximise water efficiency in all new residential and non-residential development consistent with standards evidenced through a Water Cycle Study and the water industry.</p>	<p>Recommends a water cycle study to establish water efficiency standards to be consistent with the shared standards in water efficiency developed by the water</p>	Water Resources East as an organisation covered the East of England including Essex and did extensive research into water	<i>All new residential development will be required to achieve a water efficiency standard of 85 <del>90</del>-litres</i>

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	<p>The Shared Standards in Water Efficiency for Local Plans (June 2025) is part of a joint initiative by Natural England, the Environment Agency, and water companies (Anglian Water, Cambridge Water, Essex and Suffolk Water and Affinity Water) endorsed by Water Resources East to support Local Planning Authorities (LPAs) to deliver sustainable growth. The Shared Standards provide advice and evidence to LPAs on how they can secure higher water efficiency standards for new homes and commercial developments.</p> <p>Suggested model policy wording is provided under the heading ‘Draft policy: Water Resources and Sustainable Growth’ (page 7). It is sought that these recommended policies be reviewed for potential inclusion in Policy SD9 to ensure it is more robust.</p>	<p>authorities, Environment Agency and Natural England and endorsed by Eater Resources East to address any water resources issues in Essex</p>	<p>resources in the region and their evidence base supports the efficiency standard of 85lppd to be applied across the region. CPBC has adopted the higher water efficiency standard of 85lppd within its policies as recommended by the Shared Standards in Water Efficiency endorsed by Natural England, Environment Agency and Water Resources East. Amended text but included the higher efficiency standard. CPBC has commissioned some additional work on Waste Water Treatment Work Capacity within the Borough which will be implemented into the submitted plan.</p>	<p><i>per person per day of mains supplied water/potable water. <del>Where it can be demonstrated that this is no feasible part G2 and regulation 36(2)(b) of the Building Regulations will apply. All non-residential development should achieve full credits for Wat 01 of BREEAM.</del></i></p>
<p>(128) Policy SD9 – Water Supply and Waste Water, Criteria 1, 2nd sentence, Page 187</p>	<p>Essex is a seriously water stressed area and it is important to maximise water efficiency in all new residential and non-residential development consistent with standards evidenced through a Water Cycle Study and the water industry.</p> <p>CPBC should prepare an up-to-date Water Cycle Study to help evidence a potential water efficiency standard of 85 l/p/d of mains supplied water/potable water per person per</p>	<p>Recommends the preparation of a water cycle study to evidence a potential water efficiency standard of 85lppd as recommended by the Shared Standards. Recommends removal of the option to provide current building regulation water efficiency standards</p>	<p>CPBC has adopted the higher water efficiency standard of 85lppd within its policies as recommended by the Shared Standards in Water Efficiency and is endorsed by Natural England, Environment Agency and</p>	<p>Delete final sentence of Criteria 1</p> <p><del>Where it can be demonstrated that it is not feasible part G2 and regulation 36(2) (b) of the Building Regulations will apply</del></p>

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	<p>day. The water efficiency standard of 90 l/p/d, is welcomed, but is higher than the recommended East of England 85 l/p/d Shared Standards in Water Efficiency for Local Plans. ECC seek no change to the 90 l/p/d target set in Policy SD9, as it is within the range suggested by the Shared Standards (p. 17), subject to any evidence provided through a water cycle study.</p> <p>However, the second sentence should be deleted as it weakens the policy intent to strengthen water efficiency. CPBC should prepare an up-to-date Water Cycle Study to compile local evidence that demonstrates that water scarcity is having or is likely in the future to have an adverse impact on the environment and how water efficiency can protect the environment and support nature recovery, whilst not adversely affecting viability of development.</p>		<p>South Essex water authorities. Water Resources East prepared evidence on water resources for the East of England including Essex and supports a water efficiency standard of 85llpd. Amended text but included the higher efficiency standard of 85llpd and removed the text which referenced part G2 and regulation 36(2)(b) of the Buildings Regulations will apply. CPBC has commissioned some additional work on Waste Water Treatment Work Capacity within the Borough which will be implemented into the submitted plan.</p>	
(129) Policy SD9 – Water Supply and Waste Water, Criteria 2, Page 187	<p>The Shared Standards for non-residential buildings are more stringent than those in Policy SD9. They provide evidence for the necessity of such requirements, as well as their feasibility and viability. As it is a more ambitious approach, it is required that the Shared Standards recommendations for non-residential buildings be adopted in Policy SD9 in place of criteria 2 - <i>All non-residential development should achieve full credits for Wat 01 of BREEAM</i></p>	<p>Recommended that the Shared Standards recommendations for water efficiency is applied to non-residential buildings.</p>	<p>Accepted and text amended to include all non-residential development to achieve full credits for Wat 01 of BREEAM.</p>	<p><del>All non-residential development should achieve full credits for Wat 01 of BREEAM.</del> <u>New, extended or redeveloped non-household ('non-household' means all development except residential dwellings.) buildings aim to achieve</u></p>



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				<u>full credits within the 4 water categories (WAT01, WAT02, WAT03, and WAT04) for BREAAAM standard within a minimum score of 3 credits within WAT01 Water Consumption issue category, or an equivalent standard set out in any future update to BREAAAM. The applicant will be required to justify and evidence why full credits is not possible/viable for the development.</u>
(130) Policy SD9 – Water Supply and Waste Water, Additional Criteria, Page 187	<p>The Shared Standards also provide recommendations on how to demonstrate compliance, such as through the submission of a Water Efficient Design Statement. ECC recommend that similar clauses be included in Policy SD9 to provide more clarity to both policy officers and developers on the information that must be submitted to confirm that the policy has been met.</p> <p><i>Water Efficient Design Statement must be submitted with the application at the earliest stage to demonstrate how policy requirements have been met and will be maintained in relation to water efficient design. The statement shall</i></p> <p><i>a) Baseline information relating to existing water use within a development site; and</i></p>	All development proposals to provide a Water Efficient Design Statement which should provide baseline information pre-development and full calculations of expected water use for the proposed development.	CPBC accepts the requirement of a Water Efficient Design Statement to demonstrate how water efficiency is met in development.	<p><i>A Water Efficient Design Statement must be submitted with the application at the earliest stage to demonstrate how policy requirements have been met and will be maintained in relation to water efficient design. The statement shall provide, as a minimum, the following:</i></p> <p><i>a) Baseline information relating to existing</i></p>

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	<i>b) Full calculations relating to expected water use within a proposed development (such as water efficient fixtures and fittings, rainwater/stormwater harvesting and reuse, or greywater recycling).</i>			<i>water use within a development site; and b) Full Cealculations relating to expected water use within a proposed development (such as water efficient fixtures and fittings, rainwater/stormwater harvesting and reuse, or greywater recycling).</i>
(131) Paragraph 21.70, Page 187	ECC welcome reference to the Future Homes Hub Water Efficiency Report. The reasoned justification should reference the Shared Standards in Water Efficiency for Local Plans setting out its key recommendations	Welcomes reference to Future Homes Hub Water Efficiency Report. The reasoned justification should reference the Shared Standards in Water Efficiency for Local Plans setting out its key recommendations. Typo in final sentence should be amended	Accepted typo corrected	Correct typo “rat” to “rate”  The fittings approach is where water fittings and appliances are selected which have a capacity up to the maximum flow rate only
(132) Policy SD9 – Water Supply and Waste Water, additional Paragraph, Page 187	The reasoned justification should reference the Shared Standards in Water Efficiency for Local Plans setting out its key recommendations	ECC requests a long justification paragraph explaining the Shared Standards in Water Efficiency and the application of 85lppd.	Accepted. Additional justification to support the policy should be provided.	Add additional paragraph to read. <b><u>The Shared Standards in Water Efficiency for Local Plans (June 2025) set out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex and Suffolk Water, Affinity Water, the Environment</u></b>

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				<i>Agency, and Natural England, provide advice and evidence to Local Planning Authorities (LPAs) on how they can secure higher water efficiency standards for new homes and commercial developments.</i>
(133) Chapter 22 – Monitoring Framework, Objective 6, Page 191	The EPOA Planning Policy Statement – Embodied Carbon and Circular Economy, October 2025 recommends a more suitable monitoring indicator based upon the number of buildings designed to lower embodied carbon and meet upfront embodied carbon emissions targets rather than the number of Whole Life Cycle Carbon Assessments submitted meeting all targets	Requires an alternative monitoring indicator of the number of buildings designed to lower embodied carbon and meet upfront embodied carbon emissions targets	Accepted and monitoring indicator added	Amend Monitoring indicator. Remove <del>Number of Whole Life Cycle Carbon Assessments submitted meeting all targets</del> and replace with <i>Number of buildings designed to lower embodied carbon and meet upfront embodied carbon emissions targets .</i>
(134) Chapter 22 – Monitoring Framework, Objectives 16 and 18, Page 192	The Monitoring Table does not include a specific indicator to track the delivery of Supported and Specialist Housing (SSH), as raised in ECC’s Regulation 18 response. Reference should be made to Policy Hou4 rather than Hou5 – Specialist Housing Requirements While the framework refers to “ <i>annual specific housing needs completions</i> ,” this terminology is not sufficiently clear to ensure effective monitoring of SSH delivery. ECC	Requires the addition of monitoring indicator of the annual delivery of retirement, sheltered homes by tenure and the annual delivery of extra care units by tenure	CPBC agrees to add a further monitoring indicator for specialist housing requirements	Remove <del>Annual Specific Housing Needs Completions</del>  To read <i>Policy Hou4 – Specialist Housing Requirements</i>

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	<p>notes that this may be intended to capture SSH, but the wording does not explicitly reflect the range of accommodation types covered under Policy Hou4.</p> <p>The Plan does not currently include monitoring indicators for Policy Hou4, Criteria 1a to track the compliance with the M4(2) standard.</p> <p>The proposed amendment is supported by evidence in the Local Housing Needs Assessment (2023) and the Essex Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025).</p> <p>Monitoring delivery of SSH is necessary to demonstrate how the Plan supports ECC's commissioning priorities and statutory duties under the Care Act 2014 and Children Act 1989. It also supports consistency with NPPF, paragraph 63, which requires Plans to establish need, the size, type and tenure of housing needed for different groups in the community including affordable housing (including Social Rent); families with children; looked after children, older people (including those who require retirement housing, housing with-care and care homes); and people with disabilities.</p>			<p>Monitoring Indicator % of all new homes built to standard M4(3)</p> <ul style="list-style-type: none"> <li>• <i>the annual delivery of retirement, sheltered homes by tenure</i></li> <li>• <i>the annual delivery of extra care units by tenure</i></li> </ul>
(135) Chapter 22 – Monitoring Framework, Objectives 16 and 18, Page 192	<p>The Monitoring Table does not include a specific indicator to track the delivery of Supported and Specialist Housing (SSH), as raised in ECC's Regulation 18 response. Reference should be made to Policy Hou4 rather than Hou5 – Specialist Housing Requirements</p> <p>While the framework refers to "<i>annual specific housing needs completions</i>," this terminology is not sufficiently clear to ensure effective monitoring of SSH delivery. ECC notes that this may be intended to capture SSH, but the wording does not explicitly reflect the range of accommodation types covered under Policy Hou4.</p>	Requires that Supported and Specialist housing M4(3) to be reported within the monitoring of development	Accepted and text amended for monitoring to include the percentage of M4 (3) standard housing have been provided within the development	<p><del><i>Annual Specific Housing Needs Completions</i></del></p> <p>To read <i>Policy Hou4 – Specialist Housing Requirements</i></p> <p>Monitoring Indicator % of all new homes built to standard M4(3)</p>

Policy	ECC Response	Summary	CPBC officer response	Modification
	<p>The Plan does not currently include monitoring indicators for Policy Hou4, Criteria 1b to track the compliance with the M4(3) standard.</p> <p>Monitoring delivery of SSH is necessary to demonstrate how the Plan supports ECC's commissioning priorities and statutory duties under the Care Act 2014 and Children Act 1989. It also supports consistency with NPPF, paragraph 63, which requires Plans to establish need, the size, type and tenure of housing needed for different groups in the community including affordable housing (including Social Rent); families with children; looked after children, older people (including those who require retirement housing, housing with-care and care homes); and people with disabilities.</p>			<ul style="list-style-type: none"> <li>• <i>the annual delivery of retirement, sheltered homes <del>by tenure</del></i></li> <li>• <i>the annual delivery of extra care units <del>by tenure</del></i></li> </ul>
(136) Chapter 22 – Monitoring Framework, Objectives 16 and 18, Page 192	<p>The Monitoring Table does not include a specific indicator to track the delivery of Supported and Specialist Housing (SSH), as raised in ECC's Regulation 18 response. Reference should be made to Policy Hou4 rather than Hou5 – Specialist Housing Requirements</p> <p>While the framework refers to “<i>annual specific housing needs completions</i>,” this terminology is not sufficiently clear to ensure effective monitoring of SSH delivery. ECC notes that this may be intended to capture SSH, but the wording does not explicitly reflect the range of accommodation types covered under Policy Hou4.</p> <p>The indicator for Criteria 2b should reflect the required ECC amendment to Policy Hou4, Criteria 2b to reference ‘<i>nursing care beds</i>’ rather than ‘<i>extra care beds</i>’, which is consistent with national policy and ECC's statutory duties.</p> <p>The Plan does not currently include monitoring indicators for Policy Hou4, Criteria 2b to track the annual delivery of specialist housing by type and tenure of residential care beds and nursing care beds.</p>	Need to add a monitoring indicator for Policy HOU4 to track annual delivery of specialist housing types. Change to reference nursing care beds rather than extra care beds	Accepted and text amended and monitoring indicator added to track annual delivery of specialist housing in annual monitoring reports	<p><del><i>Annual Specific Housing Needs Completions</i></del></p> <p>To read <i>Policy Hou4 – Specialist Housing Requirements</i></p> <p>Monitoring Indicator % of all new homes built to standard M4(3)</p> <ul style="list-style-type: none"> <li>• <i>the annual delivery of retirement, sheltered homes <del>by tenure</del></i></li> <li>• <i>the annual delivery of extra care units <del>by tenure</del></i></li> </ul>

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	Monitoring delivery of SSH is necessary to demonstrate how the Plan supports ECC's commissioning priorities and statutory duties under the Care Act 2014 and Children Act 1989. It also supports consistency with NPPF, paragraph 63, which requires Plans to establish need, the size, type and tenure of housing needed for different groups in the community including affordable housing (including Social Rent); families with children; looked after children, older people (including those who require retirement housing, housing with-care and care homes); and people with disabilities			
(137) Chapter 22 – Monitoring Framework, additional Monitoring Indicator, Objective 19, Page 193	ECC recommend including a monitoring indicator for Policy TC5 under Objective 19 which seeks to secure health and wellbeing outcomes. Castle Point Plan Objective 19: Secure improved health and wellbeing outcomes for residents enabling more active and healthier lifestyles, creating healthy living environments and reducing health inequalities	Include additional monitoring criteria to track health and wellbeing outcomes.	Accepted. Additional monitoring indicators around hot takeaway planning applications included and additional text referencing INFRA3 for submission of health impact assessments	Remove <del>Submission of Health Impact Assessments</del> To read: -Number of Health Impact Assessments submitted in accordance with Policy Infra3  -Submission of Health Impact Assessment for Hot Food Takeaway Applications in accordance with Policy TC5  -Number of Hot Food Takeaway Applications refused in accordance with Policy TC5
(138) Policies map	Policy GB1, Criteria 1 states that the Green Belt boundaries are defined on the Policies Map and that development	Considers that existing and potential new schools, if required	Not accepted. The Castle Point Plan is a new plan	Please refer to the SOCG – ECC maintains

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	<p>within the Green Belt will not be supported in line with the NPPF.</p> <p>ECC requires that school sites are removed from the Green Belt, where appropriate to enable any future school expansion necessary to meet pupil demand not being required to demonstrate an '<i>exceptional circumstance</i>' to development in the Green Belt. Any school sites removed from the Green Belt should then be allocated as education land on the Policies Map.</p> <p>Paragraph 43 of the Inspectors Report to the 'withdrawn' Local Plan stated there were exceptional circumstances for the removal of Glenwood School site and the land at the Cornelius Vermuyden School from the Green Belt given the extent to which they are built up, and that it was unnecessary to keep these sites permanently open.</p> <p>Similarly, the built-up areas of the USP Canvey College Campus and the former Castle View School; Deanes School and Virgin Active, Hadleigh; and the King John School, Benfleet were recommended to be removed from the Green Belt but there were not exceptional circumstances for the removal of the playing fields associated with these schools. This was confirmed in Main Modification 67 which identified the sites to be removed from the Green Belt and the boundaries re-aligned appropriately. These school sites were:</p> <p>King John School, Benfleet;</p> <ul style="list-style-type: none"> <li>• The Deanes School, Benfleet;</li> <li>• Glenwood School, Benfleet;</li> <li>• Kents Hill Infants and Junior School, Benfleet;</li> <li>• Holy Family Catholic Primary School, Benfleet;</li> <li>• Robert Drake Primary School, Benfleet;</li> <li>• Canvey Skills Campus / Procat, Canvey Island; and</li> <li>• Cornelius Vermuyden, Canvey Island.</li> </ul>	<p>to meet growth in the plan, should not be considered as an "exceptional circumstance" to development in Green Belt to allow them to expand to meet pupil demand if required. ECC accepts that there were not exceptional circumstances for the removal of the playing fields associated with these schools from the Green Belt. This was accepted in the previous withdrawn plan by its Inspector and is further highlighted in the CPBC Green Belt Assessment, paragraph 3.3.5. These sites should be removed from the Green Belt on the Policies Map.</p> <p>Request these existing school sites are allocated as education land on the policies map to strengthen the implementation of Policy Infra2.</p>	<p>and has been prepared in different circumstances to the previous withdrawn plan. The new plan proposes a new housing strategy of urban intensification consequently the Green Belt becomes more significant as the Green Belt tightly bounds the existing urban areas and there is limited green space in Castle Point. As all these sites are within designated Green Belt, the Council considers that further development of these sites is not acceptable.</p>	<p>its position as set out in the Regulation 19 response.</p>

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	<p>This approach is further supported by the Green Belt Assessment, Schools in the Green Belt, paragraph 3.3.5 which provides support for the conclusions of the examining Inspector of the Borough's previous and withdrawn Local Plan. The Inspectors Report recommended that the Policies Map be amended accordingly. The scale of the Policies Map does not provide the certainty to ECC that these sites have been removed from the Green Belt.</p> <p>The Policies Map should also annotate land that is allocated for educational use to enable and strengthen the implementation of Policy Infra2, which seeks to protect and/or enable the re-use of educational establishments where ECC has indicated they are surplus to educational requirements. The Policies Map should also be amended to allocate any additional education sites once a further cumulative assessment of the growth in the Plan has been undertaken</p> <p>ECC supports the recommendations of the Inspector into the 'withdrawn' Local Plan and the recommendations of the Green Belt Assessment, Schools in the Green Belt. ECC seek:</p> <ul style="list-style-type: none"> <li>• the General Boundary Issues, paragraph 17.9 be amended to provide commentary with regards the status of these school sites and the Green Belt</li> <li>• the Policies Map is amended to identify existing education sites</li> <li>• the Policies Map is amended to identify any additional education sites once a cumulative assessment of the growth in the Plan is undertaken (see response to Policy Infra2 – Education, Skills and Learning, paragraph 19.20)</li> </ul>			



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(139) Policies map	<p>4. Consistent with National Policy</p> <p>ECC note that MSAs are not identified on the Policies Map on page 194 of the Plan.</p> <p>Planning Policy Guidance (PPG), section 27 defines the role that planning authorities have in safeguarding mineral resources, stating that district councils should show Mineral Safeguarding Areas (MSAs) on their policy maps (PPG Reference ID 27-005-20140306).</p> <p>This is to ensure that known locations of specific minerals are not needlessly sterilised by other forms of development, whilst not creating a presumption that the defined resources will ever be worked.</p>	Require that Mineral Safeguarding Areas are identified on the Policies Map.	Accepted and Maps updated with information.	Add Mineral Safeguarding Areas to Policies Map
(140) Policy Infra4 – Open Spaces, Policies Map	ECC requires the Policies Map to be amended to remove the designation of school playing fields as public open space. School playing fields are not considered public open space in the same way as parks or village greens. While some schools may allow community access to their playing fields, they are primarily intended for the physical education and recreation of the students who attend the school. Government guidance on school land says that school playing fields are provided for the benefit of pupils and their enjoyment, and any community use is usually at the school's discretion. There is a strong policy presumption against the disposal or change of use of school playing field land, and the Secretary of State's prior consent is needed for any such action.	Removal of reference to school playing fields being defined as public open space on the Policies Map.	Accepted and maps updated	Remove school playing fields from open space designation on the Policies Map
(145) Community Facilities, Page 195	ECC seek amendment to the Glossary to provide clarification that education is not defined as being community use and thereby subject to Policy Infra1. Educational establishments and libraries should be protected for their existing use and any change of use only permitted if it has been identified by ECC or other	For Education not be defined as a community use in the glossary	Accepted and Schools, colleges and Educational Facilities be removed from community use definition in glossary	Remove from glossary under community facilities <del>Schools, colleges and other educational facilities</del>

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	<p>educational providers as being surplus to educational requirements consistent with Policy Infra2.</p> <p>The Glossary refers to schools, colleges and other educational facilities; Childcare centres and libraries as being community uses and therefore subject to Policy Infra1, which should be deleted. These uses should be covered by Policy Infra2– Education, Skills and Learning.</p>			
<p>(146) Equality Impact Assessment Pages 44, 45 and 53</p>	<p>ECC welcomes references to Supported and Specialist Housing (SSH) and inclusive design principles. However, the assessment does not fully consider whether the Plan’s policies and spatial strategy will meet the housing and accommodation needs of older people, disabled residents, and other groups with support needs</p> <p>These groups were highlighted in ECC’s Regulation 18 response and are evidenced in the Essex Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025).</p> <p>The EQIA could be strengthened by assessing how the Plan supports equitable access to appropriate housing for these groups, particularly in relation to accessible housing standards, the delivery of specialist accommodation, and the role of care-enabled technology and home adaptations in supporting independence</p> <p>ECC recommends that the Equality Impact Assessment is strengthened to better reflect the evidence base, namely:</p> <ul style="list-style-type: none"> <li>• Expand the assessment of housing needs for older people, disabled residents, and other groups with support needs, drawing on the Essex Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025).</li> <li>• Consider how the Plan’s policies and spatial strategy support equitable access to appropriate</li> </ul>	<p>Recommends that the EQIA should assess the Plan in its provision of specialist housing for older people, disabled residents and other groups with support needs.</p>	<p>The EQIA has considered specialist housing and CPBC has incorporated The SSHANA 2025 throughout the Castle Point Plan</p>	<p>The EQIA has been updated <a href="#"><u>equality-impact-assessment-update</u></a></p>

Policy	ECC Response	Summary	CPBC officer response	Modification
	<p>housing and environments for these groups, including:</p> <ul style="list-style-type: none"> <li>• Accessible housing standards</li> <li>• Delivery of specialist accommodation</li> <li>• The role of care-enabled technology and home adaptations in supporting independence</li> </ul> <p>These refinements will help ensure the Plan is effective in meeting the needs of different groups in the community, in line with the requirements of the Equality Act 2010 – Public Sector Equality Duty and NPPF, paragraph 63.</p>			
(147) Infrastructure Delivery Plan, May 2025	<p>ECC has input to the baseline IDP Baseline Review (2024) and the IDP, May 2025 with regards ECC's roles and responsibilities.</p> <p>The published IDP (May 2025) is not based on the infrastructure requirements required to deliver either Government's standard methodology housing requirements or the CPBC 6,196 homes, as set out in Policy SP3 but three growth scenarios ranging between 4,862 to 8,845 homes, including some development in the Green Belt. ECC provided CPBC with an assessment of these scenarios regarding primary, secondary and early years and childcare. Other assumptions were made by the consultant on other services based on the Developers' Guide (2024). It is noted that this iteration excludes transport costs as the Transport Assessment and Addendum (West Canvey) were still being drafted and had not been reviewed by ECC.</p> <p>Paragraph 19.20 of the Plan refers to the IDP establishing where new educational facilities are required based on the growth identified within the Plan. Policy SP3 sets out how the Plan is seeking to deliver 6,196 homes with a spatial distribution and scale of specific sites/broad locations</p>	<p>ECC has reviewed the IDP May 2025, however, there have been some additional changes to housing strategy with the addition of new sites including a large site at West Canvey.</p> <p>There has also been updated evidence following May 2025. All of this needs to be fed into an updated IDP for ECC to review prior to submission of the plan for examination</p>	<p>CPBC have provided ECC with updated data for the cumulative assessment of primary, secondary and early years education and childcare and SEND.</p> <p>In January 2026, ECC provided addendums to the education assessments previously undertaken in November 2025.</p> <p>The West Canvey IDP has been provided to ECC for comment and comments provided, which require review by CPBC.</p> <p>CPBC are preparing an update to the IDP which will</p>	Plan updated if required

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	<p>different to the IDP Scenarios previously assessed. ECC considers such differences will have a significant impact on the overall infrastructure requirements, specific site policy infrastructure requirements and potentially Whole Plan Viability Assessment.</p> <p>Whilst the strategy remains 'urban focussed' the allocated sites informing the IDP, May 2025 and site allocations in the Plan differ in terms of scale and their distribution. These disparities are further contained within the IDP/Transport Assessment and the Plan (including Site Policies) and the Housing Capacity Topic Paper.</p> <p>The Sustainability Appraisal, paragraph 28, bullet 1 infers that the plan policy position and Scenario 1 in the IDP are similar. In fact, there are significant differences in that some sites have been removed from the Plan and some 16 sites have been subject to significant change, which will impact on any infrastructure requirements. For example, West Canvey has increased from 1,000 to 2,700 homes (of which 700 post 2043) and Canvey Town Centre has increased from 200 to 820 homes.</p> <p>CPBC did not request or provide the relevant information for ECC to undertake the required cumulative assessment of the growth in the Plan, with regards its potential impact on education and early years and childcare places. This is required to be undertaken prior to submission consistent with Section 3.4 of the Essex County Council Local and Neighbourhood Planners' Guide to School Organisation and Place Planning (February 2025).</p> <p>To demonstrate potential implications, ECC, as the lead authority for Education, has undertaken a 'high-level' assessment of the Plan growth (see Appendix 4). The assessment identifies the following changes in requirements:</p>		<p>be one consolidated report (including relevant sections of the May 2025 and West Canvey Addendum October 2025) and address any outstanding issues including new and/or updated evidence that has been published and/or completed since that which informed the IDP May 2025. Some examples are set out in the ECC Regulation 19 response and include the Transport assessment and further education assessment. The final IDP will be made available to ECC to review.</p> <p>CPBC and ECC acknowledge that the soundness and legal compliance of the Castle Point Plan and its supporting evidence, including the IDP and Transport Assessment, will be considered by an independent Inspector appointed to examine the Plan <i>and will continue to work together to address</i></p>	

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	<ul style="list-style-type: none"> <li>Consultation Plan – identifies the need for two 56 place early years and childcare nurseries and primary provision (non-defined).</li> <li>ECC assessment – identifies the need for at least a new 2FE primary school; three new 72 place nurseries, of which one should be co-located with the primary school; one stand-alone 56 place nursery and potentially two further stand-alone 30 place nurseries subject to land being made available by developers. Other developer contributions where there are insufficient places to meet the generated demand.</li> </ul> <p>In addition, significant evidence base referenced in the Plan has been completed post the preparation of the IDP, May 2025, including the updated Developers' Guide (September 2025); Castle Point LCWIP; Essex Wide LCWIP; Transport Assessment (July 2025) and West Canvey Addendum (August 2025); Local Transport Plan A Better Connected Essex Transport Strategy (July 2025) and South Essex Implementation Strategy (July 2025); Essex Supported and Specialist Housing and Accommodation Needs Assessment (SSHANA, 2025); ELNRS (July 2025); and Shared Standards in Water Efficiency (June 2025). CPBC and its consultants Systra have held regular meetings with ECC with regards the preparation of the transportation evidence base. The TA Scoping Report was reviewed by ECC and considered an appropriate piece of evidence to support the Regulation 18 Consultation (Issues and Options – July – September 2024). However, ECC was not provided with the opportunity to comprehensively review the completed TA (including its Appendices) and the West Canvey Addendum (August 2025), with the latter published post commencement of</p>		<i>outstanding matters as far as possible."</i>	

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	<p>the consultation. An update to the Transport Assessment (TA), Transport Assessment Addendum; and Green Belt Sites Assessment will be required to address the issues, observations and queries identified following the ECC review of these documents (see Appendix 5) and will subsequently inform an update to the IDP.</p> <p>Prior to submission of the Plan, the IDP will require a significant update to fully reflect the evidence base referenced in the Plan, as a significant amount has been undertaken since the latest IDP.</p> <p>ECC will need to undertake a cumulative assessment of the growth for education and early years and childcare and assist to identify the necessary highway and transportation interventions necessary, along with any other relevant ECC roles and responsibilities.</p> <p>ECC was not provided with the opportunity to comprehensively review the completed TA (including its Appendices) and the West Canvey Addendum (August 2025), with the latter published post commencement of the consultation. ECC has instructed Essex Highways to review these documents and their full report has informed the response to this consultation. Any revised assessment will need to inform the next iteration of the IDP.</p> <p>The revised IDP will need to inform a review of the Whole Plan Viability Assessment which assesses the viability of the Castle Point Plan, taking into account policy requirements.</p>			
(148) Infrastructure Delivery Plan, May 2025, Chapter 11 - Waste Management	<p>The Submission Plan must be supported by an up-to-date IDP that reflects updated information consistent with that iteration of the Plan, which will need to be agreed with ECC as a primary infrastructure provider prior to submission.</p> <p>With regards Chapter 11 – Waste Management, ECC, as the Waste Disposal Authority, would welcome the</p>	Requests some additional amendments to Chapter 11 of the IDP including reference to the upgrading of RCHW facilities at Canvey, references to the adopted Waste Strategy for Essex (2024),	<p>Accepted and inserted into IDP</p> <p>ECC has reviewed a draft West Canvey IDP update and provided comments along with a further</p>	Plan updated if required

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	<p>opportunity to review the IDP prior to submission. The WDA supports the following references in the IDP May 2025:</p> <ul style="list-style-type: none"> <li>paragraph 11.2.2 - ECC through the new WSfE is exploring the need for and options available for the provision of new and additional waste transfer, bulking and haulage infrastructure capacity within South Essex. A new long-term residual waste solution is required which depending on the location may require waste infrastructure for bulking and haulage in the South of Essex. While there are currently no specific plans for new or expanded waste infrastructure, requirements will emerge during WSfE action planning. The WDA aim to explore the potential employment land that may be suitable for the provision of new WDA logistical waste infrastructure within South Essex.</li> <li>paragraph 11.2.3 - existing RCHW facilities do not match the level of growth being planned in the County and will be a challenge to meet current demand and potentially worse with more growth. ECC, as the WDA, is exploring the potential for upgrading RCHW provision to improve facilities available for residents and businesses.</li> <li>paragraph 11.2.4 - there will be a need to explore the options for upgrading the Canvey RCHW's and new or additional sites to serve the Borough and adjacent areas.</li> </ul> <p>The WDA would like to highlight a number of amendments in advance of any update to the IDP:</p> <ul style="list-style-type: none"> <li>references to the adopted Waste Strategy for Essex (2024) – paragraphs 11.1.3, 11.1.4, 11.4</li> <li>more positive need to change waste management approaches – paragraph 11.1.5</li> </ul>	a need for change waste management approaches	<p>education assessment to reflect the full policy requirement of 2,700 homes, rather than the 2,000 within the plan period.</p> <p>In January 2026, ECC provided addendums to the education assessments previously undertaken in November 2025.</p> <p>CPBC are preparing an update to the IDP which will be one consolidated report (including relevant sections of the May 2025 and West Canvey Addendum October 2025) and address any outstanding issues including new and/or updated evidence that has been published and/or completed since that which informed the IDP May 2025. Some examples are set out in the ECC Regulation 19 response and include the Transport assessment and further education assessment. The final IDP will be made available to ECC to review.</p>	

Policy	ECC Response	Summary	CPBC officer response	Modification
	<ul style="list-style-type: none"> <li>• update reference to the Essex Developers Guide to Infrastructure Contributions (2025) with updated advice regarding waste management – paragraphs 11.2.5, 11.4</li> <li>• South Essex sub-region lacks the required level of waste infrastructure for the efficient movement of waste from source to treatment facilities. A new transfer station capacity is required which could be co-located with a WCA depot and/or RCHW facility. – paragraph 11.5.3</li> </ul>		CPBC and ECC acknowledge that the soundness and legal compliance of the Castle Point Plan and its supporting evidence, including the IDP and Transport Assessment, will be considered by an independent Inspector appointed to examine the Plan <i>and will continue to work together to address outstanding matters as far as possible.</i> ".	
(149) Level 2 Strategic Flood Risk Assessment, Site Proformas	<p>ECC seek the Strategic Flood Risk Assessment (SFRA) is reviewed to take account of a number of technical matters including a climate change allowance of 45% rather than 40% consistent with Environment Agency guidance and the ECC SuDS Design Guide; identify whether sites in a Critical Drainage Area; seek to provide for rainwater harvesting where possible; reflect acceptable discharge rates; provide betterment to reduce risk of downstream flooding; and reference the Sustainable Drainage Systems Design Guide for Essex (2020), which is in line with the national SuDS Manual.</p> <p>Site assessment proformas have been prepared for sites that have been identified to be within Flood Zone 2 and/or Flood Zone 3 or routes within the Flood Zones. The proformas should refer to climate change allowance of 45% rather than 40% consistent with Environment Agency guidance. The Essex SuDS Design Guide, prepared by the LLFA, expects the Upper End climate change allowances to be used for the catchment area. This Upper end allowance for peak rainfall for small and urban catchments (Combined</p>	<p>Required that the SFRA to be updated to include a climate change allowance of 45% rather than 40% and located to identify whether sites are in a critical drainage area to reduce the risk of downstream flooding. LLFA provided a list of some specific sites to have been including: Richmond Ave, Har Road, Knightswick Shopping Centre, Canvey Library and Barclay's, Grouts and Land to the Rear of the Land Above The Paddocks, Cape Road Car park, Venables Close, Canvey Job Centre, Former Admiral Jellicoe, Land to the Rear</p>	<p>The SFRA has been updated to resolve all issues aside from including a climate change allowance of 45%. This is currently ongoing.</p> <p>CPBC and ECC acknowledge that the soundness and legal compliance of the Castle Point Plan and its supporting evidence, including the SFRA, will be considered by an independent Inspector appointed to examine the</p>	No mods.



Policy	ECC Response	Summary	CPBC officer response	Modification
	<p>Essex, South Essex) is 45% total percentage change anticipated for the 2050s (a lifetime up to 2060). This is consistent with the Environment Agency's guidance as set out in the EA Peak rainfall intensity allowance. The SFRA should also identify which sites are located within a Critical Drainage Area (CDA) as set out below:</p> <ul style="list-style-type: none"> <li>Richmond Ave Car Park - refer to a climate change allowance of 45%. The site is located within a CDA. a drainage strategy will need to consider rainwater harvesting and all areas of hardstanding should be required to be permeable.</li> <li>Knightswick Shopping Centre - refer to a climate change allowance of 45%, the northern part of the site is located within a CDA. A drainage strategy will need to consider rainwater harvesting and all areas of hardstanding should be required to be permeable.</li> <li>Canvey Library and Barclays - refer to a climate change allowance of 45%. The site is located within a CDA. A drainage strategy will need to consider rainwater harvesting and all areas of hardstanding should be required to be permeable.</li> <li>Grouts and Land to the Rear - refer to a climate change allowance of 45% The site is located within a CDA. A drainage strategy will need to consider rainwater harvesting and all areas of hardstanding should be required to be permeable.</li> <li>Land above The Paddocks – if the site is an upward extension to the building then a drainage strategy will not be required given there would be no increase in hardstanding.</li> <li>Oak Road Car park - the drainage strategy will be required to evidence how the pools of surface water will be dealt with and ensure any development does not increase flood risk elsewhere.</li> <li>Venables Close - refer to a climate change allowance of 45%. If development is built on the area of surface water flood risk the drainage strategy will be required to evidence how that surface water will be managed and should not increase flood risk elsewhere.</li> <li>Canvey Job Centre - refer to a climate change allowance of 45%.</li> </ul>	<p>of North Essex Council Offices, Corner of Little Gypps and Wick Close, Ozonia Gardens, Eastern Esplanade, Land between Station Rd and Seaview Road, Mitchell House, Lionel Rd, Knightswick Road</p>	<p>Plan <i>and will continue to work together to address outstanding matters as far as possible.</i>".</p> <p>The SFRA has been updated to identify sites which are located in a critical drainage area with reference to the guidance provided in the Sustainable Drainage Systems Design Guide for Essex (2020)</p>	

Policy	ECC Response	Summary	CPBC officer response	Modification
	<ul style="list-style-type: none"> <li>Land at the Point - refer to a climate change allowance of 45%. Any development within the flood zones should evidence how surface water will be managed.</li> <li>Former Admiral Jellicoe - refer to a climate change allowance of 45%. The site is located within a CDA. A drainage strategy will need to consider rainwater harvesting and all areas of hardstanding should be required to be permeable.</li> <li>Land to the Rear of North Avenue - refer to a climate change allowance of 45%. Where there are areas of surface water flooding a drainage strategy must evidence how these will be dealt with without increasing the risk of flooding elsewhere.</li> <li>Essex Coachworks - refer to a climate change allowance of 45%.</li> <li>Former Council Offices, Long Road - refer to a climate change allowance of 45%.</li> <li>Corner of Little Gypps and Willow Close - refer to a climate change allowance of 45%. The drainage strategy should evidence how surface water flows will be managed.</li> <li>Ozonia Gardens, Eastern Esplanade - refer to a climate change allowance of 45%. A Drainage strategy should evidence how surface water will be dealt with. Discharge to the sea can be at unrestricted rates.</li> </ul> <p>-Land between Station Rd and Seaview Road - refer to a climate change allowance of 45%. The drainage strategy should evidence how surface water will be managed. Discharge to the sea can be unrestricted.</p> <p>-Matrix House, Lionel Rd - refer to a climate change allowance of 45%. The site is located within a CDA. A drainage strategy will need to consider rainwater harvesting and all areas of hardstanding should be required to be permeable.</p> <ul style="list-style-type: none"> <li>Kushi, Furtherwick Road - refer to a climate change allowance of 45%. The site is located within a CDA. A drainage strategy will need to consider rainwater harvesting and all areas of hardstanding should be required to be permeable.</li> </ul>			

Policy	ECC Response	Summary	CPBC officer response	Modification
(150) Level 2 Strategic Flood Risk Assessment paragraphs 2.4.3 and Section 3.3 - Summary of Sites in Flood Zone, Page 9	3. Effective The Essex SuDS Design Guide , prepared by the Lead Local Flood Authority (LLFA), expects the Upper End climate change allowances to be used depending on the catchment area. This Upper end allowance for peak rainfall intensity in small and urban catchments (Combined Essex, South Essex) is 45% total percentage change anticipated for the 2050s (a lifetime up to 2060). This is consistent with the Environment Agency guidance as set out in the EA Peak rainfall intensity allowance.	Require the upper end allowance of 45% for peak rainfall intensity to be used within the Level 2 SFRA	The Level 2 SFRA will be updated with the 45% peak rainfall intensity.	No mods.
(156) Level 2 Strategic Flood Risk Assessment, Paragraph 4.1.2, Page 24	3. Effective Paragraph 4.1.2 sets out the requirements for all potential development sites. Additional bullets should include whether a site is located within a Critical Drainage Area (reference to permeable hardstanding and rainwater harvesting); all sites should provide source control of surface water and should consider the conveyance hierarchy; sites in CDAs should discharge at the 1in1 Greenfield rate for all events up to the 1in100 event plus climate change;. sites with a surface water flow path should consider what betterment can be provided to reduce the risk of downstream flooding; and regard should be had to the Sustainable Drainage Systems Design Guide for Essex (2020) in terms of the LLFA design standards which are in line with the national CIRIA SuDS Manual.	Potential development sites should identify whether the site is within a critical drainage area and provide criteria as outlined in Sustainable Systems Design Guide for Essex (2020). All sites should consider sources of surface water and provide controls.	The Level 2 SFRA has been updated to consider sites within critical drainage areas and for surface water sources to be considered.	No mods.

## Appendix 2 – Map of Castle Point Borough Council's administrative area in context with its neighbouring districts and county councils

